SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MONDAY, MARCH 14, 2005

8:30 A.M.

(PAGES 1794 THROUGH 1864)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 1794

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I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Mesereau is listed as “M” on index. Ms. Yu is listed as “Y” on index.
Mr. Sanger is listed as “SA” on index. Mr. Oxman is listed as “O” on index.

PLAINTIFF’S WITNESSES DIRECT CROSS REDIRECT RECROSS

ARVIZO, Gavin-Anton 1797-M (cont’d)

Santa Maria, California
Monday, March 14, 2005
8:30 a.m.

THE COURT: Good morning.
COUNSEL AT COUNSEL TABLE: (In unison)
Good morning, Your Honor.
THE COURT: Let's see, the witness is in his
place.
I'll remind you that you're still under
oath.
Mr. Mesereau, you may proceed.
MR. MESEREAU: Thank you, Your Honor.
Good morning.
THE JURY: (In unison) Good morning.

GAVIN-ANTON ARVIZO
Having been previously sworn, resumed the stand
and testified as follows:

CROSS-EXAMINATION (Continued)
BY MR. MESEREAU:
Q. Mr. Arvizo, on Thursday you testified about
how you learned what masturbation was. Remember
that.
A. I believe so.
Q. Pardon me.
A. I believe so. 1797

Q. Okay. And you testified that Mr. Jackson told you what masturbation is, right.
A. Uh-huh.
Q. Is that true.
A. Yes.
Q. And you testified to the jury that Mr. Jackson said that if men don't masturbate, that they can get to a level where they can -- might rape a girl. Remember that.
A. Uh-huh.
Q. Do you remember saying that.
A. Yes.
Q. Do you remember being interviewed by the Santa Barbara Sheriff's Department on a number of occasions.
A. Yes.
Q. And do you remember who interviewed you.
A. Most likely Steve Robel or Paul Zelis.
Q. Do you remember being asked, "Before we get started on the next set of questions, can you describe to us what your opinion is, what you think masturbation is." Do you remember one of the sheriffs asked you that during an interview.
A. I believe so.
Q. And you knew those interviews were being recorded, right.
A. Yes.
Q. Remember you said, "My grandma explained it 1798

1 to me. She told me that -- that your -- the only
2 reason is because like if -- if men don't do it, men
3 might get to a point where they might go ahead and
4 rape a woman". Do you remember saying that to the
5 sheriffs.
6 A. I believe so.
7 Q. Why did your story change between that
8 interview and your testimony last Thursday.
9 A. Well, what do you mean "changed".
10 Q. Well, you told the police your grandmother
11 made that quote to you, and you came into court
12 under oath and told the jury Mr. Jackson made that
13 quote to you.
14 A. That didn't change. Because Michael tried
15 to explain to me first. And I -- he was more
16 pushing on me that men have to masturbate.
17 Now, later when I came back from Neverland,
18 I guess my grandmother saw that I was very confused
19 about sexuality and things like that. And my
20 grandmother explained to me a lot of things.
21 Q. So it just so happened that after Mr.
22 Jackson told you, "If a man doesn't do it, they may
23 get to a point where they rape a woman," your
24 grandmother made the almost identical quote to you.
25 Is that what you're saying.
26 A. Not really. She didn't make the same exact
27 thing that Michael said. But I'm not exactly sure
28 what my grandmother said. I know my grandmother 1799

explained a lot of things to me.
Q. Would it refresh your recollection if I show you a transcript of your sheriff's interview.
A. Probably.
MR. MESEREAU: May I approach, Your Honor.
THE COURT: Yes.
MR. MESEREAU: Whoops, I'm sorry. Your Honor, I spilled a little water with my notebook, so --
THE BAILIFF: How about you put that over here.
Q. BY MR. MESEREAU: Mr. Arvizo, have you had a chance to look at that page of transcript.
A. Yes.
Q. Does it refresh your recollection about what you told the sheriffs about what masturbation was.
THE COURT: Just a moment, Counsel.
THE WITNESS: It refreshes my --
THE COURT: Just a moment. Let's take care of one thing at a time.
You may start again on that.
MR. MESEREAU: Yes, thank you, Your Honor.
Q. Mr. Arvizo, have you had a chance to look at that page of transcript of your sheriff's interview.
A. Uh-huh.
Q. Does it refresh your recollection about what you told the sheriffs your grandmother said.
A. It refreshes -- I can recall what my 1800

grandmother was telling me. She was -- she saw that I was embarrassed about things like masturbation and growing up, and my mother was telling me that it's okay to do it. And Michael was telling me that you have to do it.

Q. Well, Mr. Arvizo, I understand your position. But when the sheriffs asked you what masturbation was, you didn't say, "Mr. Jackson told me if a man doesn't do it, he may rape a woman." You said if -- "My grandmother told me that if a man doesn't do it, he may rape a woman," correct.

A. I believe so. That's what you showed me. But --

Q. And between the time of that interview --

MR. SNEDDON: Excuse me. Your Honor, he was about to say something when he got cut off by counsel.

MR. MESEREAU: Oh, I apologize. I had no idea.

THE WITNESS: But --

MR. MESEREAU: Excuse me. Go ahead.

THE WITNESS: But that still doesn't mean that Michael did not tell me.

Q. BY MR. MESEREAU: But what you're telling the jury is it was sort of a coincidence that both your grandmother and Michael used almost the identical phrase about raping a woman.

A. Both my grandmother and Michael were trying 1801

to talk to me about the -- pretty much the birds and the bees story.
Q. Okay. And they pretty much said the identical thing, is that what you're telling me.
A. Not exactly.
Q. Not exactly.
A. No.
Q. Well, the quotes are almost identical, aren't they.
A. You see, Michael was trying to tell me that I have to masturbate. My mom -- my grandmother was actually telling me -- giving me the talk. Michael was just talking about masturbation.
Q. But your grandmother said to you, "If men don't do it, men might get to a point where they might go ahead and rape a woman," correct.
A. Michael also told me that.
Q. Well -- so you're saying they basically said the same thing.
A. My grandmother said it's okay to do it, because sometimes, some men, they can't control themselves and might do that.
Q. But in that police interview, you never mentioned that Michael Jackson had said that to you, did you.
A. I'm sure in one of the other transcript I mentioned about Michael.
Q. Not in that interview, correct. 1802

A. But I'm sure in another one I did.
Q. Okay. I'd like to ask you just about the allegations in the J.C. Penney case, okay. We're not going to go into the evidence, just what the allegations were. Okay.
A. Uh-huh.
Q. Do you remember that case.
A. Uh-huh.
Q. And you and your mother Janet sued J.C. Penney, correct.
A. I think we did. I'm pretty sure we did.
Q. Okay. And originally your family sued for battery, false imprisonment and infliction of emotional distress, right.
A. I don't know.
Q. Okay. Later on, your mother amended the complaint to add sexual assault. Do you remember that.
A. Not really.
Q. Do you remember that you were asked questions about that in a sworn deposition.
A. I don't remember being asked about my mom being -- whatever.
Q. Do you remember being asked questions about your mother's allegations that J.C. Penney guards fondled her breasts in a parking lot.
MR. SNEDDON: Your Honor, I'm going to object; 403. 1803

THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you remember that case at all.
A. Um, a little bit. I mean, I was in the middle of my chemotherapy.
Q. Okay. Your chemotherapy was going on at the same time.
A. At the same time as those depositions.
Q. Okay. And how many -- how many appointments for chemotherapy had you had at that point, if you know.
A. They would have it once a month -- once every three weeks, actually. Then I had ten rounds. And I wasn't like a regular kid that had cancer that would just go in for a few hours and get one bag of chemotherapy. I would go there for a week, in the hospital, and -- in a bed, and they would give me chemotherapy.
Q. Okay. And approximately when did the chemotherapy end.
A. June 2001.
Q. Okay. Do you remember last Thursday I asked you when these alleged acts of masturbation by Michael Jackson occurred. Do you remember that.
A. Uh-huh.
Q. And within an approximately 20-minute period you first said a couple of days before you left with Jose Salas, right. 1804

A. What do you mean.
Q. Jesus Salas, excuse me.
A. Couple days before I left with Jose Salas.
Q. Yes. You said a couple of days before you left Neverland with Jose Salas the masturbation occurred. Do you remember that.
A. No, I did not say that.
Q. You didn't say that.
A. No, I said that it happened approximately the last two weeks of when we left Neverland for good.
Q. Well, first you said a few days, and then you said a week, and then you said a couple of weeks, right.
A. Maybe you said that it was a few days.
Q. Did you discuss over the weekend these facts with anybody.
A. No.
Q. Did you discuss the case with anybody over the weekend.
A. I had a brief conversation with Mr. Sneddon.
Q. Okay. And what did you talk about.
A. We talked about certain things that you might ask me.
Q. And like what.
A. Just things about me.
Q. Pardon me.
A. Things that you might ask about me. 1805

1 Q. Like what.
2 A. Like my history.
3 Q. Your history.
4 A. Uh-huh.
5 Q. And what do you mean, your “history”.
6 A. In school maybe.
7 Q. Pardon me.
8 A. In school maybe.
9 Q. And what did Mr. Sneddon say to you about
10 that.
11 A. He just told me to answer honestly.
12 Q. And what else did he talk to you about.
13 A. That’s pretty much it right there.
14 Q. How long was the discussion.
15 A. 15 minutes.
16 Q. Did he say anything to you about an
17 interview he had with a witness over the weekend.
18 A. With a witness besides me.
19 Q. Yes.
20 A. No.
21 Q. Did he ask you anything about one of your
22 teachers at school.
23 A. Um, yes. He asked me about it.
24 Q. And who was that.
25 A. My teacher.
26 Q. Yes.
27 A. It’s -- he wasn’t really my teacher. His
28 name is Richard Geralt. 1806

1 Q. What did Mr. Sneddon say to you about
2 Mr. Geralt.
3 MR. SNEDDON: I'm going to object. It
4 assumes facts not in evidence that I said anything.
5 MR. MESEREAU: I'll rephrase the question,
6 Your Honor.
7 THE COURT: All right.
8 Q. BY MR. MESEREAU: Did Mr. Sneddon say
9 something to you about Mr. Geralt.
10 MR. SNEDDON: Same objection.
11 THE COURT: Overruled.
12 THE WITNESS: Can you repeat the question.
13 Q. BY MR. MESEREAU: Did Mr. Sneddon say
14 anything to you over the weekend about Mr. Geralt.
15 A. He didn't have to tell me anything. I told
16 him everything. I told him the facts about Mr.
17 Geralt.
18 Q. Let me ask the question again. Did Mr.
19 Sneddon over the weekend say anything to you about a
20 Mr. Geralt.
21 A. He asked me about Mr. Geralt, so it's kind
22 of knowing, I guess.
23 Q. What did he ask you about Mr. Geralt.
24 A. He asked me what do I know of Mr. Geralt.
25 Q. And did you tell him.
26 A. Yes.
27 Q. What did you tell him.
28 A. I told him about -- that I knew Mr. Geralt. 1807

Q. Excuse me.
A. I told him that I knew of Mr. Geralt.
Q. Did you tell him anything else.
A. About Mr. Geralt.
Q. Yes.
A. I told him about school and how Mr. Geralt was.
Q. And what did you tell him.
A. About Mr. Geralt.
Q. Yeah. What did you tell him about Mr. Geralt and school.
A. I told him that -- about a time when he -- he was a detention teacher. And I had detention, and I was in there.
Q. Pardon me.
A. I was in his detention.
Q. Okay. What else did you tell Mr. Sneddon about Mr. Geralt.
A. I told him that one time when I was in detention, I was sitting there, and he told us we had to do work, our homework. I didn't have a pencil. So I asked him, "Mr. Geralt, may I have a pencil." And then he put me against the wall, because I asked if I could have a pencil.
Q. Did you tell Mr. Sneddon anything else about Mr. Geralt.
A. Uh-huh.
Q. What else. 1808

A. That sometimes in the middle of his class he would go outside and smoke a cigarette.
Q. What else.
A. Um, that he always tried to handle his classes as if he was a drill sergeant.
Q. Okay. What else.
A. I told him a story about -- that detention.
Q. Okay. What did you tell him.
A. I told him there was one time that I was in detention, same -- and then when I was against the wall, I asked Mr. Geralt, "Why is it that I'm against the wall. I would like to do my work as you told me to do."
Q. What else did you tell Mr. Sneddon.
A. And then Mr. Geralt asked me, he said if I was on drugs. He said that if I was on -- doing marijuana or doing crack or something, and he told me he was going to give me a drug test.
Q. What else did you tell Mr. Sneddon.
A. I told him that I was -- "Mr. Geralt, I'm not on drugs." And then Mr. Geralt said that he's going to call the cops, and this and that, because he was saying that I was on drugs. But he was doing it in a way that he was making fun of me.
Q. Now, Mr. Geralt was a teacher, correct.
A. He was a teacher at the school.
Q. At what school.
A. John Burroughs Middle School. 1809

Q. Did you tell Mr. Sneddon anything else about Mr. Geralt.
A. Yes.
Q. What else did you tell him.
A. I -- then I told Mr. Geralt that, "Why is it that you're going to call a police officer here who would rather be doing something more important than something as my minute and dumb as this."
Q. And anything else you told Mr. Sneddon about Mr. Geralt.
A. And then after I told Mr. Geralt that, he realized that I was right, and he put his phone away. And then he called the campus supervision. And then he kept on going on that I was doing drugs and this and that. He said he -- he was just saying stuff like that.
And then he went into -- he called campus supervision, and then they took me into the office. And then I told the teachers what happened, and they said they know how Mr. Geralt is.
Q. Did you tell Mr. Sneddon anything else when you spoke to him over the weekend.
A. No. We talked about a lot -- we talked about a few things. I don't remember too much.
Q. You don't remember too much.
A. Well, I do, and -- I don't remember the exact things, I mean, word for word.
Q. Why don't you just tell us generally what

you talked about.
A. My history, mostly.
Q. Pardon me.
A. My history.
Q. Your history.
A. Yes.
Q. Please tell the jury what you told Mr.
Sneddon about your history.
A. I just told you.
Q. Anything else come up in that discussion.
A. Yeah.
Q. What else.
A. Are you trying to specify something.
Q. No, I'm just simply asking you to tell the
jury what you told Mr. Sneddon when you spoke to him
over the weekend about your testimony in this case.
A. Please be specific.
Q. Well, I'm just asking you. I wasn't in the
conversation. What else do you remember. Please
tell the jury anything else that was discussed.
A. Talked about my father.
Q. Did you talk about a Mr. Alpert.
A. Oh, yes. Yes, we did.
Q. Did I just jog your memory a little bit
about that.
A. Yes.
Q. Did Mr. Sneddon tell you he had been in an
interview with a Mr. Alpert on Saturday. 1811

A. Yes. Well, I don't know if -- no, he said
if I was -- if Mr. -- the dean, Alpert, interviewed
me or talked to me.
Q. And did he ask you questions about any
discussions you ever had with Dean Alpert at John
Burroughs School.
A. Yeah, he asked some questions about it.
Q. In fact, Mr. Arvizo, he asked you whether
you had been interviewed by Dean Alpert and whether
you had confessed to him that Mr. Jackson never did
anything to you of a sexual nature, right.
A. Yeah.
Q. Why didn't you say that at the beginning.
A. I told Mr. Alpert that he didn't do anything
to me.
Q. You told Dean Alpert that twice, correct.
A. I don't know how many times I told him.
Q. Well, that was the reason Mr. Sneddon
telephoned you, wasn't it, as far as you knew.
A. What do you mean.
Q. Mr. Sneddon telephoned you --
A. Oh, telephoned.
Q. -- to ask you whether you had ever confessed
to Dean Alpert that Michael Jackson never did
anything to you of a sexual nature, right.
A. I don't remember Mr. Sneddon calling me and
asking me that question.
Q. You don't recall Mr. Sneddon asking you any 1812

1 questions like that over the weekend.
2 A. Over the weekend, if Michael had done
3 anything to me.
4 Q. No, Mr. Arvizo. Let me just -- let me just
5 try and rephrase it, if I have confused you.
6 Mr. Sneddon called you over the weekend,
7 right.
8 MR. SNEDDON: Your Honor, I'm going to
9 object. That's a misstatement of his testimony and
10 it assumes facts not in evidence that I called him.
11 THE COURT: Sustained.
12 Q. BY MR. MESEREAU: Did Mr. Sneddon telephone
13 you over the weekend.
14 A. No, he did not.
15 Q. Did you telephone Mr. Sneddon over the
16 weekend.
17 A. No, I did not.
18 Q. Did you engage in a conversation with Mr.
19 Sneddon over the weekend.
20 A. Yes, I did.
21 Q. Where did that conversation take place.
22 A. In a house.
23 Q. Okay. Did Mr. Sneddon come to see you.
24 A. No.
25 Q. Did you go to see Mr. Sneddon.
26 A. Yes.
27 Q. Where did you go to see Mr. Sneddon.
28 A. In a house. 1813

Q. In his house.
A. In a house.
Q. Okay. Who was with you, if anybody.
A. Detective Robel. Mr. -- Ron, Gordon and
Mr. Sneddon, and I believe Mr. Mag was there.
Q. Okay. Let me just get it straight. Mr.
Robel was there from the Santa Barbara Sheriffs,
right.
A. Yes.
Q. Mr. Sneddon was there, right.
A. The attorneys were there.
Q. Prosecutors. Prosecutor Zonen was there,
right.
A. All of the district -- all of the attorneys
were there.
Q. Prosecutor Auchincloss was there, right.
A. Auchincloss.
Q. Yes. The fellow seated right to my left.
A. Oh, Gordon, yeah.
Q. Anyone else there besides those four.
A. Mag.
Q. Who.
A. Mag. I don't know his full name.
Q. Okay. Is this another sheriff.
A. No, this is an attorney.
Q. Another prosecutor.
A. He's another attorney.
Q. So you met with four prosecutors and a Santa 1814

1 Barbara Sheriff over the weekend, right.
2 MR. SNEDDON: Your Honor, I'm going to
3 object again. It assumes facts not in evidence that
4 all of those people were present during the meeting.
5 MR. MESEREAU: I think that's what he just
6 said.
7 MR. SNEDDON: No, he didn't.
8 THE COURT: Sustained.
9 Q. BY MR. MESEREAU: Did you meet over the
10 weekend with three prosecutors.
11 A. No.
12 Q. Did you meet with four prosecutors.
13 A. No.
14 Q. Did you meet with any prosecutors.
15 A. Yes.
16 Q. Who were they.
17 A. One, Mr. Sneddon. And Steve Robel -- and
18 Detective Steve Robel was present.
19 Q. Okay. Was anyone else present.
20 A. They were there, but they were in another
21 room.
22 Q. Okay. Who was there but in another room.
23 A. Ron, Mr. Zonen, Gordon and Mag.
24 Q. Okay. I'm not hearing that. Is it Meg or
25 Mick.
26 A. Mag.
27 Q. Mag. Okay. And as far as you know, Mag's a
28 prosecutor, correct. 1815

A. Yes, I believe so.
Q. Okay. Now, what day did you have this meeting.
A. I believe it was yesterday.
Q. And approximately what time did the meeting take place.
A. 6:00, maybe 7:00.
Q. So that would be last evening, right.
A. Uh-huh.
Q. Did you learn in advance that the meeting was going to take place.
A. A couple hours before.
Q. And how did you learn the meeting was going to take place.
A. They -- they told me.
Q. Okay. Who's "they".
A. Detective Steve Robel told me.
Q. Okay. Did he call you on the phone.
A. No, he told me.
Q. Did he call you on the phone.
A. He told me.
Q. Okay.
A. No, did he not call me on the phone.
Q. Did you call him on the phone.
A. No.
Q. Did he show up at your house.
A. No. I don't live up here.
Q. I'm just trying to ask you how you found out 1816

about the meeting. That's all I'm asking.
A. I told you, he told me.
Q. Okay. Where did he tell you about the meeting.
A. He told me at a house.
Q. Where you're staying, right.
A. Yes.
Q. Okay. Did he come to the house.
A. Yes.
Q. Okay. Approximately what time did Mr. Robel come to the house to tell you there was going to be a meeting that evening with all the prosecutors.
MR. SNEDDON: Your Honor, I'm going to object to that question. There was no meeting with all those prosecutors. Misstatement of his testimony.
MR. MESEREAU: I'll rephrase it, Your Honor.
THE COURT: All right.
Q. BY MR. MESEREAU: Mr. Arvizo, at approximately what time yesterday did you learn you were going to travel to another location to meet with Mr. Sneddon and others.
A. Um, other -- it was around maybe 5:00 or something like that.
Q. Okay. And you obviously attended the meeting, right.
A. Yes.
Q. Do you know if the conversation was

recorded.
A. I don't believe it was recorded.
Q. Do you know if anyone was taking notes.
A. Um, no, I don't think anyone was taking notes.
Q. Okay. Did anyone tell you what the purpose of the meeting was.
A. No.
Q. No one explained why you were having a meeting last night.
A. No. They told me that Tom was going to have to talk to me about some things.
Q. Okay. And Mr. Sneddon did talk to you about some things, correct.
A. Yes.
Q. And he talked to you about an interview that had been conducted on Saturday, right.
A. No.
Q. Did Mr. Sneddon ever tell you he had conducted an interview with a Mr. Alpert on Saturday.
A. No, did he not tell me that he conducted an interview.
Q. Okay. Did he ever tell you he had spoken with Mr. Alpert.
A. Yes.
Q. And what did he say about that.
A. He asked me about Mr. Alpert. 1818

Q. Okay.
A. What I knew.
Q. And did he ask you if you ever had a meeting with Mr. Alpert, correct.
A. Yes.
Q. And you told him you did, right.
A. Yes.
Q. You told him you met --
A. I told him that I'm pretty sure I did -- I did. Because I didn't really remember too good.
Q. You didn't remember too good that you had told Mr. Alpert that Mr. Jackson had never touched you sexually.
A. Well, I believe it happened, because he was a dean of the school. And so -- I'm pretty sure I had a conversation with him.
Q. Okay. And did you tell Mr. Sneddon you were pretty sure you had had a conversation with Dean Alpert at John Burroughs School.
A. Yes.
Q. Did you tell Mr. Sneddon approximately when you had that discussion.
A. No.
Q. Did Mr. Sneddon ever ask you when you had that discussion.
A. No.
Q. Where did the discussion with Dean Alpert take place. 1819

A. I don't remember. It was probably in his office.
Q. Okay. And the purpose of the discussion was what, if you know.
A. It was probably about Michael.
Q. Okay. You say "probably about Michael".
A. Uh-huh.
Q. But you're not sure.
A. I'm not sure what the whole conversation was about.
Q. Okay. But sometime in that conversation, Dean Alpert looked you in the eye and said, "Are these allegations that Mr. Jackson sexually abused you true," right.
A. Uh-huh.
Q. And you said they were not true, right.
A. Yeah. I told him that Michael didn't do anything to me.
Q. Okay. Mr. Alpert asked you twice whether or not Michael Jackson had ever done anything of a sexual nature to you, correct.
A. I don't know if he asked me twice.
Q. Well, the first time he asked you, you shook your head "No," right.
A. I don't know.
Q. And the second time he asked you, you said to him, "No, he did not touch me in any sexually inappropriate way," correct. 1820

A. I don't know.
Q. You don't know.
A. I'm pretty sure I told him that.
Q. Okay.
A. But, I mean, I don't know how exactly it happened.
Q. Okay. Now, based on what you've already said, you also discussed a teacher named Geralt, right.
A. Yes.
Q. When I started asking you questions about your discussion with Mr. Sneddon, the first person you mentioned was Mr. Geralt, correct.
A. Yes.
Q. Mr. Geralt was also a teacher at the school, right.
A. Yes.
Q. Okay. And in summary, you had some disciplinary problems with Mr. Geralt, right.
A. I had a lot of disciplinary problems.
Q. Excuse me.
A. I had a lot of disciplinary problems.
Q. You had a lot of them.
A. Uh-huh.
Q. What disciplinary problems did you have.
A. I would get into fights sometimes at school.
Q. Pardon me.
A. I would get into fights sometimes at school. 1821

Q. Okay. You got into a lot of them, didn't you.
A. Not a lot. I got into a few.
Q. Okay. And were you ever asked to leave the school.
A. No, I don't think so.
Q. Were you ever asked to leave class.
A. Yes.
Q. Okay. And approximately when did that happen.
A. Um, well, a lot of teachers at John Burroughs Middle School, once anyone even talks out of turn, they'll send you out of class.
Q. Well, you got up in class and accused Teacher Geralt of having his balls in his mouth, right.
A. His balls in his mouth.
Q. Yes.
A. No, because I was never in one of his classes.
Q. Do you deny doing that.
A. I don't even remember ever doing that.
Q. Were you in any programs after school with Teacher Geralt.
A. I believe he was an ROTC instructor.
Q. Okay. So you were in ROTC at the time, right.
A. No. Not exactly. Because I had so much 1822

experience in that field of marching, and military, military aspects, he -- they liked me being an advisor there.
Q. Well, you were accused by Mr. Geralt of being totally disruptive in that program, right.
A. In the ROTC program.
Q. Yes.
A. I don't remember that. I remember them loving me there because the whole -- the whole -- their whole cadet corps was disciplined, and -- and knew what they were doing. It was getting better at marching.
Q. And you accused the cadet core of being stupid, right.
A. I might have called a few cadets -- that they looked stupid with their uniforms. But -- if their uniforms look ugly, that they need to make them look better. But I don't think I remember calling the whole core stupid.
Q. Now, you said you were accused of being on drugs, right.
A. Yes.
Q. And you say that was false, right.
A. Yes. I don't -- will never go on drugs.
Q. Okay. Who accused you of being on drugs.
A. Mr. Geralt.
Q. Okay. And did he ask you if you were on drugs. 1823

A. He was doing it in a way that he was trying to make fun of me.
Q. Were you escorted away from the other students at one point.
A. During the detention.
Q. Yes.
A. Actually, all of the students in there were kind of cheering me on because they all knew how Mr. Geralt is, and no one's ever stood up to him before.
Q. But you stood up to the teacher, right.
A. I was already standing up, so --
Q. Excuse me. I'm sorry, I didn't hear what you said.
A. I guess so.
Q. You did stand up to Teacher Geralt, right.
A. Yes.
Q. You confronted him, right.
A. Yes, after he had brought himself down to my level by doing those things. By not -- see, because I believe teachers are higher than me because I'm just a student. When a teacher does something like that and makes fun of me and tries to say I'm on drugs, he's no longer the level of a teacher, he's come down to my level.
Q. And you were angry about that, right.
A. Um, I felt as if he was -- didn't deserve respect as a teacher. 1824

Q. Didn't deserve respect as a teacher.
A. No.
Q. Okay. So you did not respect him because you didn't think he deserved it, right.
A. I didn't respect him as a person.
Q. And you told him that, didn't you.
A. I didn't tell him those exact words.
Q. Pardon me.
A. I didn't tell him, "I don't respect you."
I didn't tell him in those exact words.
Q. Okay. Did Teacher Geralt do anything to discipline you, that you can recall.
A. He gave me detention once, I think.
Q. Okay. And when you say "detention," what do you mean.
A. Detention with him again.
Q. Excuse me.
A. A detention with him again.
Q. Okay. And what was detention. What did he take you do.
A. He had us go in this -- the auditorium, because there was a lot of kids. Well, first we'd be in his classroom, and usually there would be a lot of kids, so we would usually move over to the auditorium because it was bigger, and then we would do our homework in there. It was after school.
Q. Okay. Since we're on the subject of school, I'd like to just ask you some questions about your

experiences at school. Okay.
A. Uh-huh.
Q. Did you know a teacher named Murphy.
A. Mr. Murphy, yes.
Q. You were disciplined by Mr. Murphy as well, correct.
A. I don't remember too much about Mr. Murphy.
Q. Well, was Mr. Murphy one of your teachers.
A. He was for a while, but I asked the counselor -- my counselor to move me out of his class.
Q. Why did you want to get out of Mr. Murphy's class.
A. I didn't like how he conducted his classroom.
Q. What didn't you like about it.
A. He was just hard to understand, the way he was trying to teach.
Q. Well, he accused you of being disruptive in his class, didn't he.
A. Uh-huh. Yes.
Q. Okay. Were you disruptive.
A. Um, now that I look back, yes. I -- I was dis --
Q. How were you disruptive in Mr. Murphy's class.
A. I might ask a question without raising my hand. 1826

Q. Excuse me.
A. I might ask a question without raising my hand.
Q. Okay. Your answer is, “I might ask a question.” Did you or did you not do that.
A. I’m pretty sure I did. I mean --
Q. Well, he accused you of being uncooperative and disruptive, didn’t he.
A. He accused me of being uncooperative because I didn’t sign a detention he gave me because I didn’t believe it was correct.
Q. I’m sorry, you’re speaking a little fast. I couldn’t understand that. Could you just repeat it.
A. He accused me of being uncooperative because of a detention he had given me and I did not want to sign it because I didn’t believe it was a --
Q. What didn’t you want to sign.
A. A detention.
Q. Excuse me.
A. A detention that he had written up.
Q. Did you refuse to sign it.
A. Yes.
Q. And what happened after you refused to sign it.
A. He told me -- he gave me -- he wrote up a referral, and I believe he sent me to Dean Alpert.
Q. Did you know a Mr. Parker at school. 1827

A. Yes.
Q. Who was Mr. Parker.
A. He was a new guy that came. I think he was going to take Dean Alpert's spot, and Dean Alpert was going to move up or something.
Q. At one point you apologized to Mr. Parker, didn't you.
A. Yes.
Q. What did you apologize to Mr. Parker for.
A. Probably apologized about the way I was in school and stuff.
Q. And what do you mean by that.
A. About how I disrespected teachers sometimes.
Q. Okay. And that was correct, wasn't it. You did disrespect your teachers sometimes, correct.
A. Yes.
Q. Did you know a Mr. Collins.
A. I don't remember Mr. Collins.
Q. Do you remember anyone named Collins at the school.
A. No.
BAILIFF CORTEZ: I need you to speak up a little louder. Okay.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: How about a Mr. or Mrs. Slaugh, S-l-a-u-g-h.
A. Probably talking about Miss Slaughter.
Q. Okay, Slaughter. 1828

A. Uh-huh.
Q. Do you remember a Miss Slaughter.
A. Yes.
Q. Do you remember having problems in -- with
Miss Slaughter.
A. I was -- not really. I mean --
Q. You don't recall arguing with that teacher.
A. Oh, yeah. I remember.
Q. What was that argument about.
A. It's because I asked to go to the rest room.
And I told her that I had to go to the rest room or
else I'll have problems. And then she still
wouldn't let me go.
Q. And then what happened.
A. I told her about how I had cancer and stuff,
and she still wouldn't let me go to the rest room.
Q. And what did you do about that.
A. I sat back in my seat.
Q. You requested to be transferred out of that
class, right.
A. Well, it's like they had all these -- I
didn't really request to get out of Miss Slaughter's
class, but I wanted to get out of Mr. Murphy's
class. They have different -- they have A, B, C and
D, I think. And then C was what I was in. And C is
a whole block of teachers that everyone is in, and
they all switch around.
Q. Okay. Well, you were accused of screaming 1829

words that the other students were jumping around
like retarded people, right. Do you remember that.
A. I don't know.
Q. Do you remember that.
A. Yes.
Q. And --
A. Well --
Q. Please tell the jury --
A. Barely.
Q. -- what happened.
A. I don't really remember what I said. It
probably happened, because a lot of times there
was -- I would stand up to the teacher. A lot of
the kids would kind of congratulate me, and then --
Q. You were kind of a hero for standing up to
teachers.
A. Sometimes.
Q. Okay. Do you remember a teacher named Fink.
A. I think you're talking about Mr.
Finklestein.
Q. Who is Mr. Finklestein.
A. He was my math teacher.
Q. You had problems in that class also, didn't
you.
A. I think everyone in his class had a problem
with him.
Q. Let me just ask about you. Did you have
problems in Mr. Finklestein's class. 1830

A. I was “everyone.”
Q. Pardon me.
A. I was one of the “everyone.”
Q. You’re saying everybody had a problem.
A. If everyone had a problem, then I would be one of them, right.
Q. I’m just asking about yourself. Okay. Did you have problems with your conduct --
A. Yes.
Q. -- in Mr. Finklestein’s class.
A. Yes.
Q. Please tell the jury what those problems were.
A. Same problems with every other teacher.
Q. And what do you mean by that.
A. I was kind of argumentative sometimes, and I shouldn’t have been. I didn’t like the way he taught because I wasn’t learning anything.
Q. And what did you do in his class that caused a disruption.
A. I would argue sometimes about the way he would teach, and that he wouldn’t use our textbooks. And I asked him why we have these textbooks, if he didn’t let us use them.
Q. And were you disciplined at all.
A. Yes, sometimes he would send me out of class.
Q. And how many times were you asked by this 1831

1 teacher to leave the class.
2 A. I don't know.
3 Q. Was it more than five.
4 A. I don't know.
5 Q. Was it -- do you think it was ten.
6 A. I don't know.
7 Q. Do you have any idea at all.
8 A. I remember him -- I know I got sent more
9 than once, but, I mean, I don't remember the exact
10 number.
11 Q. Okay. But you were accused of disrupting
12 that class, right.
13 A. Yes.
14 Q. Do you remember someone named Moon. Is
15 there a teacher named Moon.
16 A. I remember the name, but I'm not sure which
17 teacher it was.
18 Q. Well, you were accused of singing in the
19 classroom and disrupting the class, right.
20 A. Can you tell me more about Mr. Moon.
21 Because I don't remember really who he is.
22 Q. Let me ask you this: Were you accused of
23 being defiant, singing in the classroom, talking,
24 disrupting testing, and they had to call your
25 parents.
26 A. Mr. Moon. Mr. Moon. Oh, he's my home room
27 teacher. I don't know.
28 Q. You don't recall any problems with that 1832

1 teacher.
2 A. No, because he was my home room teacher, and
3 I hardly do anything in that class.
4 Q. Okay. So you don't recall any problem with
5 a teacher named Moon, right.
6 A. No.
7 Q. Okay. Now, how many times did you refuse to
8 write an apology to teachers.
9 A. I don't remember being asked to write an
10 apology.
11 Q. Well, didn't you just say before you were
12 asked to apologize at one point.
13 A. No, I have -- they didn't ask me to
14 apologize. I apologized to Mr. Parker.
15 Q. But you were asked to write an apology to a
16 child who you insulted in class, correct.
17 A. I don't remember that.
18 Q. Okay. Would it refresh your recollection if
19 I just show you a note from your school records.
20 A. Yes.
21 MR. MESEREAU: May I approach, Your Honor.
22 THE COURT: Yes.
23 MR. SNEDDON: Go ahead.
24 THE WITNESS: I can't really understand that
25 writing.
26 Q. BY MR. MESEREAU: You can't read that.
27 A. I see "apology" -- it's kind of messed up
28 writing. 1833

THE COURT: Wait a minute. Just a moment.
He's just asking you to read that and see if it
refreshes your memory, not to comment on it.
Just -- no, you just read it and see if it refreshes
your memory.
THE WITNESS: I can't understand it.
Q. BY MR. MESEREAU: You didn't read that at
all.
A. It looks like -- kind of like scribbles.
Q. I'm sorry.
A. It's like doctor's writing.
Q. You can't read any of it.
A. I can't read that. It's unlegible.
Q. Okay. Do you recall an incident like that.
A. Writing to a student, no.
Q. Pardon me.
A. Writing an apology letter to a student, I
don't remember.
Q. Do you recall being asked to write an
apology to a student.
A. No.
Q. Okay. Do you recall being accused of not
completing your school assignments and tasks.
A. Yeah, I wouldn't ever do my homework or
anything.
Q. You would never do it.
A. Okay. I did it sometimes. Like in eighth
grade I did it for my science class, because I kind 1834

1 of liked it.
2 Q. Now, you testified last week that Mr.
3 Jackson didn't help you with your homework, right.
4 A. No. I said that he might have helped me for
5 that one little bit of homework that I did, but he
6 didn't really help me too much.
7 Q. Okay. But he helped you a little bit,
8 right.
9 A. Foe that one little bit of the assignment.
10 Q. Okay. Do you know a Mr. Davy.
11 A. Yeah, he was the vice principal. He was a
12 cool guy.
13 Q. Which school.
14 A. John Burroughs.
15 Q. Okay. Do you remember having discussions
16 with Mr. Davy about your disciplinary problems.
17 A. Yes.
18 Q. And please tell the jury what those
19 discussions were all about.
20 A. I don't really remember too good. Probably
21 the same thing I talked about like with dean -- or
22 Mr. Parker, that to get better.
23 Q. Well, you had discussions with Mr. Davy,
24 right.
25 A. Uh-huh.
26 Q. The subject of the discussions was your
27 being disruptive, right.
28 A. Probably, yes. 1835

Q. Please tell the jury what you and he discussed.
A. I don't really remember. It was in the eighth grade. Well, it was a while ago.
Q. Would it refresh your recollection if I just show you one of your school records. And this is typed up.
A. Oh, yes.
MR. MESEREAU: May I approach, Your Honor.
THE COURT: Yes.
Now, when he shows you that, he's just going to ask you if that refreshes your memory. You're not to say what's on the page or you're --
THE WITNESS: Oh, okay.
THE COURT: -- not to discuss it. There's only one issue in front of you. Go ahead.
THE WITNESS: All right.
Oh, I remember Miss Super.
Q. BY MR. MESEREAU: Have you had a chance to read that document.
A. Yes.
Q. Does it refresh your recollection about problems you had with Mr. Davy.
A. Well, that wasn't a letter from Mr. Davy. That was a letter from --
THE COURT: Just a moment. He's just asked you whether or not that refreshes your recollection about problems you had with Mr. Davy. That's a 1836

1 “yes” or “no” answer.
2 THE WITNESS: No, I never had problems with
3 Mr. Davy.
4 THE COURT: That’s not the question.
5 Listen. Did that paper refresh your recollection
6 about any problems you have had with Mr. Davy.
7 “Yes” or “no.”
8 THE WITNESS: No.
9 THE COURT: All right. Next question.
10 MR. MESEREAU: Yes, Your Honor.
11 Q. Did you ever have a discussion with Mr. Davy
12 about your disciplinary problems with other
13 teachers.
14 A. Yes.
15 Q. Please tell the jury what went on in that
16 discussion.
17 A. I don’t really remember too good. I mean,
18 he would tell me to get better, or stuff like that.
19 Q. Anything else.
20 A. Pretty much that’s it.
21 Q. Do you know someone named Bender.
22 A. Yes, yes. Miss Bender.
23 Q. Who is Miss Bender.
24 A. She was my history teacher.
25 Q. And she was your history of teacher in
26 November of 2002, correct.
27 A. Yeah, I think so.
28 Q. Okay. And she complained to Mr. Davy about 1837

you having disciplinary problems in school, right.
A. Probably.
Q. Do you remember that.
A. Not really. But, I mean, she probably did.
Q. Would it refresh your recollection if I show you a memo from her to Mr. Davy.
A. I don't think so, because I would never really see those. They would -- the teachers would give them to them about me. They wouldn't, like, pass it to me to give to them. They wouldn't have me read it.
Q. To your knowledge, she did complain about your behavior, true.
A. She probably did. Because a lot of teachers did.
Q. In her class, right.
A. Yeah.
Q. Okay. You got complaints from almost every teacher at John Burroughs School, right.
A. Uh-huh.
Q. And you were going to John Burroughs School in 2002, correct.
A. Uh-huh.
Q. Were you there in 2001.
A. I had cancer in 2001.
Q. So you weren't at John Burroughs School then.
A. I had -- that was -- I had finished my 1838

chemotherapy in June 2001. So I started -- I believe I started in seventh grade in -- or -- I'm not sure. Probably the sixth grade. I don't know. All I know is what -- because when I got out of cancer, I think I was in the sixth grade at LeConte Middle School.

Q. But you entered Miss Bender's class in world history and geography in 2002, right.

A. Uh-huh.

Q. Okay. And she complained that you were defiant on a regular basis and disrespectful to her, correct.

MR. SNEDDON: Your Honor, I'm going to object as asked and answered. He's already answered this question.

THE COURT: Overruled.

You may answer.

THE WITNESS: Can you repeat the question.

THE COURT: I'll have it read back.

THE WITNESS: Thank you.

(Record read.)

THE WITNESS: Yes, I believe so.

Q. BY MR. MESEREAU: She also said you appeared to have good acting skills, right.

A. I don't know if she said that.

Q. Would it refresh your recollection if I show you her memo to Mr. Davy.

A. Probably not, because I never saw the memo 1839

1 before.
2 Q. Well, do you recall her ever saying anything
3 to the effect, “You have good acting skills”.
4 A. No.
5 Q. Okay. When you were at John Burroughs
6 School, what kind of grades did you get, generally
7 speaking. Were they good.
8 A. No.
9 Q. Were they poor.
10 A. Yeah.
11 Q. Okay. And how long were you at John
12 Burroughs School.
13 A. Seventh and eighth grade, I believe.
14 Q. Okay. So that would be two years.
15 A. Probably. I mean, because I don’t think I
16 stood there the whole seventh and eighth grade.
17 Q. I’m sorry, I couldn’t hear that.
18 A. I don’t think, because, I mean, a few months
19 I was at Neverland, I don’t think I stood there the
20 whole two years of school.
21 Q. Did you discuss these disciplinary problems
22 that you had at John Burroughs School with
23 Mr. Sneddon last night.
24 A. Yes.
25 Q. Did he ask you about all these teachers.
26 A. No.
27 Q. Well, he asked you about some teachers,
28 didn’t he. 1840

A. Yes.
Q. What teachers did Mr. Sneddon ask you about last night.
A. He asked me -- well, I don't think he asked me about teachers. I think he just -- I just recall Mr. Geralt. And Alpert, the dean.
Q. Do you recall a teacher named Martinez.
A. Oh, yes.
Q. Martinez was your drama teacher, correct.
A. Yes.
Q. And you were accused of being disruptive in that class, weren't you.
A. Probably.
Q. Now, were you taking -- excuse me, let me rephrase that.
Let's talk about the year 2002 when you were having these disciplinary problems in John Burroughs School, okay. Were you taking any medication then.
A. I was taking my 500 milligrams of Amoxicillin, the antibiotics I have to take for like the rest of my life, and the -- and five milligrams of Lycinopril for my kidney.
Q. Now, at some point you entered into an agreement to do independent study, right.
A. Yes.
Q. And approximately when was that.
A. I'm not sure. Toward the end -- probably the second semester of the eighth grade. 1841

Q. And approximately what year would that be.
A. 2003, I think.
Q. Excuse me.
A. Maybe 2003.
Q. Okay. You attended Roosevelt High School at one point, right.
A. No.
Q. Did you ever go to Roosevelt High School.
A. No.
Q. Did you ever go to City of Angels.
A. No.
Q. Ever do an independent study program with City of Angels.
A. I don't know if it was with City of Angels, but I did an independent study program.
Q. Okay. Again, what year was that, if you know.
A. Probably 2003.
Q. Okay. And how about Bernice Carlson Hospital School. Do you recall that school.
A. No.
Q. Don't recall ever being enrolled there. All right. Before Burroughs, which school did you go to.
A. I think it was LeConte Middle School.
Q. Excuse me.
A. LeConte Middle School.
Q. Is it LeComt. 1842

A. LeConte.
Q. LeConte. And where was that located.
A. North Hollywood. It was a magnet school.
Q. Did you ever have any disciplinary problems at that school.
A. Yeah, probably.
Q. Please tell the jury what disciplinary problems you had at that school.
A. Same stuff. I mean, I was -- I wasn't that good of a kid then.
Q. Okay. And what did you do that was a problem.
A. Argue with teachers, stuff like that.
Q. Did you get disciplined at that school.
A. Yeah, I'm pretty sure I did.
Q. Please tell the jury how you were disciplined.
A. They would probably give me detention or something like that.
Q. And what were you accused of doing at that school.
A. Being argumentative and confrontational and stuff like that.
Q. Let me get back to your conversation with Mr. Sneddon last night. Did he ask you who Jeffrey Alpert is.
A. He asked me who Dean Alpert was.
Q. And did you tell him who Jeffrey Alpert is. 1843

A. I don't know if Dean Alpert was the same Jeffrey Alpert, because, I mean, I only call him Dean Alpert. So I don't know if we're talking about the same guy, because there's -- I think there's another guy named Alpert there.
Q. Okay. Did you tell Mr. Sneddon you knew who Dean Alpert was.
A. Yes.
Q. Did you tell him when you first met Dean Alpert.
A. Yes. Well --
Q. What did you tell Mr. Sneddon.
A. Well, I didn't really tell him when I first met him, but I told him that I knew that I met him.
Q. Okay. Did the conversation begin with a discussion about Mr. Alpert or Mr. Geralt.
A. I believe it was about Mr. Geralt first.
Q. Okay. And you told Mr. Sneddon your history with Mr. Geralt, right.
A. I told him about that one story that I told you.
Q. Pardon me.
A. I told him about that one story that I told you.
Q. Okay. And after you finished telling Mr. Sneddon about your experiences with Mr. Geralt, did you then start talking about Mr. Alpert.
A. No, he asked me if I remember who Mr. Alpert 1844

was.
Q. Okay. Now, you were sent to Mr. Alpert's office many times for disciplinary problems, correct.
A. Uh-huh.
Q. Generally fights, correct.
A. Um, not really. Because I didn't want to fight in the seventh grade -- well, every time I would get into a fight, I would be sent there. I got into one fight in seventh grade with an eighth grader, and I'm not -- I remember one fight, but I know I got into more than one in the eighth grade.
Q. Okay. But you were -- you had a lot of meetings with him about --
A. Yes.
Q. -- allegations, at least, that you were a discipline problem, right.
A. No, I had meetings with him because I was a disciplinary problem.
Q. Okay. Okay. And do you know approximately when Dean Alpert called you in his office to ask you if any of these allegations involving Michael Jackson were true.
A. I believe it was after I came back from Neverland.
Q. Pardon me.
A. I'm pretty sure it was after I came back from Neverland, the eighth grade. 1845

Q. Okay. And he looked at you, and he said, "Look at me, look at me, Gavin. I can't help you unless you tell me the truth. Did any of this happen. Did anything bad happen." Remember that.
A. Um, yeah, I believe so.
Q. And your response was, "No, nothing happened," right.
A. Yeah.
Q. Okay. You used to send a lot of letters and cards to Michael Jackson, correct.
A. Yes.
Q. When did you begin sending letters and cards to Michael Jackson.
A. When I met him, I guess.
Q. Excuse me.
A. When I met him.
Q. Would that be the first trip to Neverland.
A. Yeah, I don't think I gave him a card when -- the first day I met him, but, I mean, it was probably around the times that I knew him.
Q. You also were sending cards to his assistant named Evvy, right.
A. Yes. She was a really nice lady.
Q. Please tell the jury who Evvy is.
A. I think she's like the assistant to Michael or something like that.
Q. You sent a card to her saying that you loved her, right. 1846

A. Yeah -- I believe I did.
Q. Yeah, your whole family did, right.
A. I think we did.
Q. Said, "Evvy, sweetheart, we love you,"
right.
A. I don't know if we said that, but I mean --
Q. Would it refresh your recollection if I just
show you a copy of a card.
A. Sure. Yes.
MR. MESEREAU: May I approach, Your Honor.
THE COURT: Yes.
MR. SNEDDON: Could I see the card for just
a second.
THE WITNESS: It's --
THE COURT: Just a moment. He's just showing
you the card, remember.
THE WITNESS: Okay.
THE COURT: Now he's going to ask you if it
refreshes your recollection.
THE WITNESS: All right.
Q. BY MR. MESEREAU: Have you had a chance to
look at that card.
A. Yes.
Q. Does it refresh your recollection about
sending a card to Evvy.
A. A little bit. Because I knew we sent cards
to Evvy.
Q. Okay. You called her a sweetheart and said 1847

you loved her, right.
MR. SNEDDON: Your Honor, I'm going to object to that question, because counsel's not laid the foundation that he recognizes the handwriting as being his.
THE WITNESS: That's my mom's --
THE COURT: Just a moment.
MR. SNEDDON: Lack of foundation.
MR. MESEREAU: I'll go into it, Your Honor.
THE COURT: The objection is overruled.
THE COURT: You may answer. I'll have the question -- do you want the question read back.
THE WITNESS: Yes.
(Record read.)
THE WITNESS: Yes.
Q. BY MR. MESEREAU: And you used to write cards to Michael and call him "daddy," correct.
A. Yes.
Q. And you would refer to yourself as his son, right.
A. Well, I called him "daddy," and then he would call me his son.
Q. Well, you yourself wrote to him and said, "To Daddy Michael, from your son Gavin," correct.
A. That's probably after he called me "son."
Q. Let me just ask you the question again, because you got to answer the question.
A. Okay. 1848

Q. Isn't it true that you sent a letter to
Michael Jackson, you addressed it to "Daddy Michael,
from your son Gavin".
A. I mean, I'm -- I don't know every letter I
ever sent to him, but, I mean, I probably did.
Q. Do you remember doing that.
A. Not really.
Q. Would it refresh your recollection if I just
show you that, the letter.
A. Yes.
MR. MESEREAU: May I approach, Your Honor.
THE COURT: Yes.
THE WITNESS: Yeah.
Q. BY MR. MESEREAU: Have you had a chance to
look at that document.
A. Yes.
Q. Does it refresh your recollection about
sending Michael Jackson a letter that said, "To
Daddy Michael, from your son Gavin".
A. Yes.
Q. Do you remember sending another card to
Michael Jackson that said, "I miss you, Daddy
Michael".
A. I don't know -- I probably did send him
that.
Q. Do you know for sure if that happened.
A. Not for sure, but I'm pretty sure I did.
Q. Would it refresh your recollection if I just 1849

show you the card.
A. Yes.
MR. MESEREAU: May I approach, Your Honor.
THE COURT: Yes.
THE WITNESS: Oh, yes.
Q. BY MR. MESEREAU: Okay. Have you had a
chance to look at that document.
A. Yes.
Q. Does it refresh your recollection about your
sending a card to Michael Jackson that said, "I miss
you, Daddy Michael".
A. Yes.
Q. Okay. How often would you send cards or
letters to Michael Jackson.
A. I'd probably send them maybe once a month or
something like that.
Q. And you used to ask him for his phone
numbers, right.
A. He would give me some of his phone numbers.
Q. Pardon me.
A. He would give me some of his phone numbers.
He gave them.
Q. But correct me if I'm wrong, did you tell
the jury last week that he gave you phone numbers
that ended up not working.
A. No, I told you he gave me phone numbers, and
after a while they didn't work.
Q. And you would then routinely ask him for 1850

numbers that did work, right.
A. Not really routinely. But, I mean, I asked him.
Q. Okay. Do you know approximately when you began sending letters or cards to Michael Jackson.
A. Probably when the numbers didn't work no more, and all we had was Evvy to talk to.
Q. Do you remember sending a letter to Michael Jackson that said, "I love you, Daddy Michael. And tell my little brother and little sister that I love and care about them. Thank you for everything, Daddy Michael. Thank you for being my Daddy Michael. Thank you for helping me be happy and beat cancer." Do you remember sending him a letter like that.
A. Not really, but I mean I probably did.
Q. Would it refresh your recollection if I just show you the card, or a copy of the card.
A. Yes.
MR. MESEREAU: May I approach, Your Honor.
THE COURT: Yes.
THE WITNESS: Oh, I remember.
Q. BY MR. MESEREAU: Have you had a chance to look at that copy of a card.
A. Yes.
Q. And does it refresh your recollection that you wrote to Michael Jackson yourself and thanked him for helping you beat cancer. 1851

A. I remember that card.
Q. Pardon me.
A. I remember that card.
Q. You did write to Michael Jackson yourself and thanked him for helping you beat cancer, correct.
A. I wrote that in the letter, yes.
Q. Okay. You used to also write letters to Michael Jackson's children, right, Prince and Paris.
A. I might have.
Q. You called Michael, Prince and Paris your very best friend -- friends in the world, right.
A. I don't know.
Q. Do you recall doing that.
A. No.
Q. Would it refresh your recollection if I show you a copy of that card.
A. Yes.
MR. MESEREAU: May I approach, Your Honor.
THE COURT: Yes.
THE WITNESS: I don't remember writing that.
Q. BY MR. MESEREAU: You don't remember that.
A. No.
Q. Do you remember writing any letters that were addressed to Michael, Prince and Paris.
A. My writing doesn't -- no.
Q. You don't recall ever doing that.
A. No. My writing doesn't look that good. 1852

Q. Pardon me.
A. My writing doesn't look that good.
Q. Okay. Now, you used to write Evvy, Michael Jackson's personal assistant, and thank her for what she had done for you, correct.
A. Yeah, I would thank her for, like, setting up stuff and helping us.
Q. What nice things had Evvy done for you.
A. She would like -- when I would -- she helped me set up the AOL account with the Internet.
Q. I'm sorry, I can't --
A. She helped me set up the Internet on the computer that Michael --
Q. What else did she do for you.
A. She was just a really nice lady. I mean, we would call her and she would be really nice to me.
Q. Do you recall ever writing to Michael Jackson about his injuring his foot.
A. Yes.
Q. And tell the jury what you told Michael Jackson about that.
A. I just told him, like, I hope he feels better, or stuff like that.
Q. You told him that your family was praying for him, true.
A. I think so.
Q. You said you felt sorry about his foot being broken, right. 1853

A. Yes.
Q. And you said you couldn't wait till you could play at Neverland again, right.
A. Yes.
Q. You called him "daddy" in that letter, right.
A. Yes, I believe so.
Q. Is that true.
A. I don't know, but I'm pretty sure I did.
Q. Okay. You reminded him that he keeps all of his promises, right.
A. Yeah, he would tell me he keeps every promise he says.
Q. Okay. And you reminded him of that in your letter at one time, right.
A. Yes.
Q. And you said, "I wish I could be with you in New York and watch you record your music stuff." Remember that.
A. No.
Q. Would it refresh your recollection if I just show you a copy of this letter.
A. Yes.
MR. MESEREAU: May I approach, Your Honor.
THE COURT: Yes.
THE WITNESS: Oh, yeah, I remember that.
Q. BY MR. MESEREAU: Have you had a chance to look at that document. 1854

A. Yes.
Q. And you wanted to go to New York and be with
Mr. Jackson in a recording studio, right.
A. I guess. I mean, yeah.
Q. And that didn't happen, right.
A. No.
Q. You never traveled with Mr. Jackson to New
York.
A. I never traveled with Mr. Jackson.
Q. You called him the nicest, most loving
person in the world, right.
A. Yes.
Q. You said, "I love you, Daddy Michael,"
right.
A. Yes.
Q. You said, "Thank you, Daddy Michael, for
being my best, best friend forever and ever," right.
A. Yes.
Q. Okay. You sent another card to him and it
said, "Here's a little something to make you feel
better while your leg is healing. Ha ha, ha ha.
Love you. Love, your son Gavin." Do you remember
that.
A. Yeah.
Q. Do you remember doing that.
A. Yes. Yes.
Q. Okay. Do you remember sending him a card
asking him to, "Please come back, I miss you, I love 1855

1 you". Do you remember that.
2 A. No.
3 Q. Would it refresh your recollection if I show
4 you a copy of that card.
5 A. Yes.
6 MR. MESEREAU: May I approach, Your Honor.
7 THE COURT: Yes.
8 Q. BY MR. MESEREAU: Have you had a chance to
9 look at that document.
10 A. Yes.
11 Q. Does it refresh your recollection.
12 A. Not really.
13 Q. Okay. You don't recall saying words to
14 Mr. Jackson, "Come back, I miss you, I love you".
15 A. I mean, because I probably did, but I don't
16 really remember sending a letter.
17 Q. Okay. Now, to your knowledge, other members
18 of your family were sending cards to Mr. Jackson as
19 well, right.
20 A. Yes.
21 Q. Okay. You sent a lot of cards that were
22 signed, "Your son, Gavin," true.
23 A. Yes.
24 Q. All right. You used to refer to Michael as
25 your best friend, right.
26 A. Yes.
27 Q. You used to refer to him as "cool," right.
28 Right. 1856

A. I don't know if I said "cool," but I probably did.
Q. You said you liked being in the music studio at Neverland.
A. Yes.
Q. Were you ever in his music studio at Neverland.
A. Yes.
Q. Were you with Michael Jackson.
A. Yes.
Q. Who else was there.
A. I think David was there.
Q. You said who.
A. David.
Q. Your father.
A. No, the -- the -- the dude that would, like, work with all the computers and stuff. And one time when we went in there and he was doing his hair with one lady.
Q. This is someone who works on the computers at Neverland.
A. Well, I don't know if -- he's like a computer-whiz-type guy. And then the other time was with the lady that was in there doing his hair or something.
Q. How often were you in the music studio at Neverland.
A. Not really that often. I mean, I would go 1857

in there sometimes.
Q. Would you go in there with Michael Jackson or would you go in there with someone else, typically.
A. I would usually go in there when Michael was probably already in there.
Q. And usually what time of day would that be.
A. Afternoon.
Q. Was there a general time you used to go in there.
A. Not really, because it was pretty random. I mean, because we would be probably bored, and then we'd ask, "Where's Michael at," and then we would go to his studio.
Q. And how long would you stay in the studio, typically.
A. An hour or two. Like, we would be in there, and it would kind of give Michael a little break from working. And once he had to go back to work, we would leave and go do something else.
Q. Were you ever in that music studio when Michael Jackson was not present.
A. I think I might have been in there once.
Q. How did you get in.
A. Well, the door was probably open. Because there's a code there, and you can't really get in without the code.
Q. How did you get the code. 1858

A. I said that I didn't know the code. So the door might have been open or something.
Q. Excuse me.
A. It was either someone was already probably in there, or the door was open, because I didn't know that code.
Q. But you and Star used to go into that studio without Mr. Jackson, didn't you.
A. No, I don't remember going there randomly.
Q. Do you ever remember being in there with your brother Star.
A. I probably went in there once without Michael being there, but, I mean -- it was probably just to look in there and look if Michael was there.
Q. And my question is -- you're telling the jury you probably went in there. And my question is, how did you get in, if you know.
A. I don't know, because I didn't know the code. So it wouldn't be punching in the code.
Q. Okay. Did you ever ask anybody for the code to the studio at Neverland.
A. No, I don't think so. I mean, because that was like Michael's work area, so I wouldn't even really want to be in there.
Q. Were you ever in the theater with your brother Star when Michael Jackson was not present.
A. Yes.
Q. How did you get in. 1859

A. The door was usually open to the theater.
Q. And what did you and Star do in that theater when Michael was not with you.
A. Watch movies.
Q. Did you just pick the movies yourself.
A. No. They -- they had this list of all the movies that would be playing in the theater, at his theater. They had like this chalkboard, and you write them there, and say that we could go watch them; that these are the movies that would be playing. And we would go and talk to the guy that works the projector and we asked him what movie to play. And we'd get our little snacks from the booth place and then we'd go sit down and watch.
Q. And did you feel you could just go in there anytime you wanted.
A. Pretty much.
Q. Okay. And did you do that.
A. Yeah. Yes.
Q. Did you start using that theater from the first time you ever visited Neverland.
A. I think we went in there the first time we visited at Neverland.
Q. And correct me if I'm wrong, you would simply go in there and pick whatever movie you wanted, or would it just be the movie for the day.
A. Sometimes they would only have one movie and sometimes they would have more than one movie, and 1860

we would go in there and we would watch it.
Q. When you were recovering from cancer, did you used to go into that theater and watch movies.
A. When I had cancer, I think I went in there and watched movies.
Q. Okay. When did you learn your cancer was in remission.
A. June 2001.
Q. Okay. And after you learned your cancer was in remission, when is the next time you remember speaking to Michael Jackson.
A. When he wanted me to go up and do the Martin Bashir thing.
Q. Was that the first time you recall speaking to Michael Jackson after you learned your cancer was in remission.
A. Yes.
Q. Okay. These cards that I just showed you, letters and cards, you started sending them shortly after you met Mr. Jackson, correct.
A. Well, not really, because I think we -- I think I started wanting to send the cards when Michael wasn't talking to me anymore.
Q. When he wasn't talking to you anymore.
A. Yeah.
Q. And approximately when do you think he wasn't talking to you anymore.
A. Two months into my cancer. 1861

Q. Excuse me.
A. Two months into my chemotherapy.
Q. Approximately when would that be.
A. August or September of 2000.
Q. Okay. So August or September of 2000, you and your family started sending nice letters and cards to Michael Jackson, correct.
A. Yes.
Q. And those are the letters and cards that I showed you a little while ago, right.
A. Yes.
Q. And it was your understanding your mother used to send him cards and letters as well, right.
A. I think so.
Q. And she used to refer to him as "daddy," didn't she.
A. I don't think she referred to him as "daddy."
Q. You never heard her say that once.
A. Well, toward me, me saying that. Because, I mean, my dad had left. And I started calling him "daddy" after my dad left because I didn't have a dad.
Q. And your mother approved of that, correct.
A. Yeah.
Q. Okay.
THE COURT: All right. Let's take our morning break. 1862

(Recess taken.)

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REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify: That the foregoing pages 1797 through 1863 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on March 14, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California,
March 14, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
OFFICIAL COURT REPORTER

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MONDAY, MARCH 14, 2005

(PAGES 1865 THROUGH 2016)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 1865

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THE COURT: All right. You may proceed.
MR. MESEREAU: Thank you, Your Honor.
Q. BY MR. MESEREAU: Gavin, I just want to ask you a couple of questions about your illness. Okay. Looking at your medical records, clearly you had a massive amount of tumor, right.
A. Yes.
Q. And you had surgery on your spleen, a kidney, the tip of your pancreas, right.
A. I don't know about my pancreas. But they took out my kidney and my spleen.
Q. All right. Now, how long after your surgery did you learn you were in remission.
A. After my surgery. It wasn't -- you're not in remission until you're done with your chemotherapy.
Q. Okay. So when were you told your cancer is in remission.
A. June 2001.
Q. Okay. And when was your surgery, if you know.
A. June 2000.
Q. Okay. So one year after your surgery, were you told the cancer had disappeared.
A. Yes.
Q. Okay.
A. June of 2001.
Q. Okay. And in 2001, you did not go to 1867

Neverland, correct.
A. No.
Q. In 2000 you made a number of trips to
Neverland, right.
A. Yes.
Q. So you started going to Neverland right
after you had your surgery, right.
A. Not right after, because I had to recuperate
from the surgeries.
Q. Okay. How many months after your surgery do
you think you started going to Neverland.
A. It was probably after the first round of --
because I had to recuperate from the surgery and
then I had to do my first round of chemotherapy.
Q. Okay.
A. And so after my first round of chemotherapy,
I believe I went to Neverland.
Q. You can play sports now, correct.
A. Yes.
Q. And what sports do you play.
A. I play football.
Q. Okay. What position.
A. They have me at wide receiver, but they kind
of realized that I was too big, and -- to play wide
receiver.
Q. Okay.
A. So they put me on corner now.
Q. Now, have you -- have you ever learned what 1868

kind of cancer it was.
A. They didn't -- no one ever knew what kind of cancer it was. That's why I only believe that God gave me this cancer to guide my life in a certain way --
Q. Right.
A. -- because they -- no one -- they sent it all over the country and no one could figure out what kind of cancer it was.
Q. What I'm asking is this: How long after the surgery did you learn there was no cancer in your body at all. Was it one year.
A. It was -- well, it's like they had a CAT scan after my fifth round of chemotherapy.
Q. Right.
A. And then they said they couldn't see the cancer anymore, but they said they still had to finish the rest.
I asked them, "Why can't I stop now then."
Because, I mean, I didn't like taking chemotherapy, because it made me nauseous and a bunch of other stuff.
But he said I had to finish the next five, because it could be to where it's really, really small, to where you can't see it under a microscope.
So they said I had to finish.
Q. Okay. Do you recall -- let me rephrase the question. 1869

1 Do you remember in 1996 making a false
2 allegation that your mother abused you.
3 MR. SNEDDON: Your Honor, I'm going to
4 object to that. 403.
5 THE COURT: Sustained.
6 Q. BY MR. MESEREAU: I asked you some questions
7 about Evvy Tavasci. And she was Michael Jackson's
8 assistant, right.
9 A. Yes.
10 Q. And did you talk to her often.
11 A. Yeah.
12 Q. And --
13 A. Yes.
14 Q. -- when did you begin talking to her.
15 A. I began talking to her once I -- the first
16 time I met Michael, I mean, I would call her
17 sometimes and ask her about stuff. I would talk to
18 her, and I would ask her if she knew where Michael
19 was sometimes, or stuff like that.
20 Q. Well, how many times do you think you
21 telephoned Evvy Tavasci.
22 A. I don't know. I don't know how many times I
23 called her.
24 Q. You called her quite often, didn't you.
25 A. I believe so.
26 Q. And do you know when you began telephoning
27 Evvy.
28 A. When I first met Michael. 1870

Q. And did Michael give you her phone number.
A. I believe so.
Q. Did Michael tell you you could call Evvy when you wanted to.
A. Not really. It was -- I wasn't supposed to just call her for a lot of times. Or like -- for just like business -- well, not really business, but, I mean, stuff like if I wanted to go to Neverland or something like that.
Q. I can't hear what you're saying.
A. If I wanted to go to Neverland or something like that.
Q. Okay. Did you think she was your friend.
A. Yes.
Q. Okay. Did you think she was a friend of your family.
A. Yes.
Q. And did you call her every week.
A. No, not really. I mean, we would call her sometimes, but I don't know if it was every week.
Q. You mentioned that she had helped you set up an AOL account on the computer that Michael Jackson gave you, right.
A. Yes.
Q. And approximately when did she set up that account, if you know.
A. After Michael had given me the computer. Michael told me that he wanted to get me Internet

for the computer, so he told me just like -- that's the kind of stuff I'm talking about to call Evvy, to call Evvy and she would help me set it up.
Q. When you called Evvy to help set up that account, were you recovering from cancer.
A. No. I was in the middle of it -- I mean, I just started.
Q. Excuse me, I couldn't understand that.
A. I just started chemotherapy.
Q. Okay. So you had just started chemotherapy when you first began talking to Evvy.
A. Because the first time I went up to Neverland he gave me the computer, so that's when he told me that he wanted me to get Internet. So when I came back, that's when I set it up, came back to my house. That's when I set up the Internet.
Q. So you came back to your house with a computer that Michael Jackson had given you, right.
A. Yes.
Q. You called Evvy to help set up an AOL account, right.
A. Yes.
Q. You wanted an Internet account, correct.
A. I thought it would be cool if I had one.
Q. Okay. And Michael Jackson ended up paying for that, true.
A. Yes.
Q. Okay. And you requested a screen account 1872

name, right.
A. Well, I didn't request it. Well, it's because I have the computer and they were telling me what to do. And I put my name in -- I put the screen name I wanted in there.
Q. Okay. You put the screen name you wanted in there.
A. Yeah. Like there's -- well, when you have the CD and you're setting it up, like it tells you to do all the things, and --
Q. Right.
A. -- there's a point where they have you put in what screen name you want.
Q. Right.
A. And I put the screen name that I wanted in there.
Q. Did you do this right after you returned home with the computer Michael Jackson had given you.
A. Probably not right after. Maybe a few days after.
Q. Okay. And was this one of the first things you did when you got home.
A. No. Because it was a few days after I got home.
Q. Okay. So a few days after you returned from your first trip to Neverland, you tried to set up an AOL account on the computer that Mr. Jackson had 1873

given you, right.
A. Yes, I did set up an AOL account.
Q. Was that the first computer you'd ever owned.
A. Yes.
Q. Was it the first computer you'd ever used.
A. No, because I -- no.
Q. Explain -- let me rephrase that.
When did you first learn to use a computer.
A. In the first grade.
Q. Okay. Did you own a computer at any time before Mr. Jackson gave you the computer.
A. No.
Q. Okay. But you knew how to use one, correct.
A. I wasn't like a cyber guy, but I knew how to generally use a computer.
Q. You knew what an AOL account was, right.
A. Not really. They told me.
Q. But you immediately started to set one up when you got home with the computer Mr. Jackson gave you, right.
A. Not when I got home. A few days later.
Q. You called up Evvy about setting up that account, right.
A. Yeah. Because -- well, yeah. Yeah.
Q. And you requested a screen account name of gblade2000 --
MR. SNEDDON: I'm going to object to that. 1874

THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you remember the password -- excuse me, let me rephrase that. Do you remember the prosecutor asked you questions about passwords.
A. Yes.
Q. And do you remember you talked about what passwords you wanted.
A. Not -- to the prosecutor.
Q. Yeah. Did you say something about "hawk".
A. Oh, I told him that one of my screen names that I had was whitehawk344.
Q. Please tell the jury what a screen name is.
A. It's on the Internet. You have like a name that you go by, and that's the screen name.
Q. Do you remember asking Mrs. Tavasci to change the password to "sexy," s-e-x-y.
MR. SNEDDON: Your Honor, I'm going to object again. This is in violation of the Court's order.
THE COURT: Sustained; that is a violation. The jury's admonished to disregard that. You're instructed not to go into that.
MR. MESEREAU: Yes, Your Honor.
Q. Let me ask you questions about the alarm system.
Do you recall the alarm system at Neverland.
A. I remember an alarm system that was up at -- 1875

where like you would see -- where you would -- this one house where they put all this stuff in, like his awards and his gloves, and stuff like that.
Q. When did you first learn about the alarm system at Neverland.
A. Well, he had passwords and stuff, so I'm pretty sure those were alarm systems.
Q. And when did you first see an alarm system at Neverland.
A. I saw the code things, but I never really saw the alarm system.
Q. Now, what code things are you talking about.
A. The code that you push so the doors would open.
Q. And how did you learn about those codes.
A. We'd go into the main house, Michael gave me a code, I guess that's what I learned about it.
Q. Do you remember the number of the code he gave you.
A. No.
Q. Do you remember any of the code numbers at Neverland.
A. I remember the code to his room.
Q. What was the code number to his room.
A. I'm pretty sure it was like 1960.
Q. And approximately when did you learn that code number.
A. I didn't learn that until after I came back 1876

1 from Miami.
2 Q. Had you ever been -- excuse me. Had you
3 ever learned any code number at Neverland before you
4 got back from Miami.
5 A. Yes. They -- when I was visiting the first
6 time, they told me the code to the main house.
7 Q. Who is “they”.
8 A. It was either Michael or the maids.
9 Q. Did you ever ask anybody for the code at
10 Neverland.
11 A. Yeah, I would ask Michael.
12 Q. And did you ever ask anybody else.
13 A. Well, not really. I mean, I would ask the
14 maids sometimes when I would forget the code and
15 they would remind me. But when I would ask -- like
16 when I didn’t know the code at all, and I would
17 first ask, I would usually ask Michael.
18 Q. Did you ever ask any security person any
19 code number.
20 A. No.
21 Q. Did you ever see your brother or sister ask
22 any security person for any code number.
23 A. No.
24 Q. Do you recall having the code to get into
25 Michael’s room.
26 A. Yes.
27 Q. Do you recall having the code to get into
28 any other room at Neverland. 1877

A. No.
Q. Never did.
A. No. I think those are the only two.
Q. Do you recall ever going into any room at Neverland when Michael Jackson wasn't present, besides his bedroom.
A. I mean, there's a lot of rooms there. I don't -- maybe we'd go in the arcade and play video games. I don't know if that counts.
Q. What rooms at Neverland have you been into when Michael Jackson was not present.
A. The theater. The main house. My unit. The train house -- the train station. I guess that's it.
Q. Are they the only rooms you ever went into when Michael Jackson wasn't present.
A. Oh, maybe the library, too.
Q. Did you ever go into his children's bedrooms, Prince and Paris.
A. Yeah. Well, when Michael wasn't -- I wouldn't go in there if -- I mean, because I would go in there to visit Prince and Paris, but, I mean, I never went in there when they weren't there.
Q. Did you ever go into Prince's room when Michael Jackson wasn't at Neverland.
A. I don't think I did.
Q. Are you sure.
A. Not really, because -- I might have walked 1878

through there or something, because, I mean, when you walk up some stairs, there's -- like all the rooms are connected between all the doors.
Q. Did you ever go into Paris's room at Neverland when Michael Jackson was not present.
A. I don't think I did. I mean, because their room is like -- because you could walk through the doll room and just go right to the upstairs. So, I mean, their room wouldn't really be a room that you can really walk through. So, I mean, I don't think I ever went into that when they weren't there.
Q. Are you sure.
A. I'm pretty sure.
Q. Okay. Is Prince's room near Paris's room.
A. No, I don't think so. I think they're like -- both doors are like in two different corners of the whole upstairs thing.
Q. Have you been in every room in the main house.
A. Um, I believe so.
Q. And why do you believe so.
A. Because I was there a long time, you know, when Paris was there -- or when Prince and Paris were there, and, like, I was there one time when they were getting ready to go to bed. I would walk through the doll room, and then I would go up to where the train thing was, and then they were having their class one time that -- Grace was teaching 1879

them. And then I went up there, and I was -- I think I was teaching Prince something. I was helping Grace. And --

Q. Were you helping Grace teach --

A. Yes.

Q. -- the children.

A. Yes.

Q. Where were you helping Grace teach.

A. I don't know. It was probably -- I don't even think I was really helping them. I think I was helping them with a puzzle or something.

Q. With a puzzle.

A. Yeah.

Q. You said you were helping with homework or something along those lines, right.

A. Well, I was helping with their schooling.

Q. With their schoolwork.

A. With their schooling.

Q. Please tell the jury what help you were giving Grace as far as the children's schooling is concerned.

A. It wasn't really, like, teaching, like you wouldn't say, "This and this equals this," or whatever. I was just like -- like Prince might have been doing a drawing, and I was -- I was talking to him about it, and I was saying, "Well, it's really nice," and -- or like they might have been doing a puzzle, and I would be helping them do it or 1880

something like that.
Q. Did you do that more than once.
A. I think I only did that once.
Q. Okay. And did you ask Grace if you could help out before you did that.
A. Yes.
Q. And she said "yes".
A. Yes.
Q. Okay. How long was that session.
A. Well, I think their school is only like three hours. But, I mean, I think I was only in there for, like, 30 minutes to an hour.
Q. Okay. And was it your understanding that Michael Jackson's children do their schooling at Neverland.
A. I -- I -- I thought that wherever -- I thought Grace would teach them, and then Grace would go wherever they go, so I guess it would be anywhere.
Q. And was this teaching going on in one of the children's bedrooms.
A. No.
Q. Where was it going on.
A. It was upstairs, like in the little playroom place.
Q. Well, there's a room upstairs which has school materials, right.
A. Yes. 1881

Q. And what school materials have you seen in that room.
A. I saw this little tiny chalkboard, and then like these big floor piece puzzles, and -- I don't really remember.
Q. But you've seen schoolbooks in there, correct.
A. No, I don't think so.
Q. Well, that's where the children do their schooling, as far as you know, right.
A. No. I said that I think whenever Grace wants to teach them, that's where they do their schoolwork.
Q. Okay. But you've seen blackboards, you've seen school materials; correct.
A. I said I saw a little kid blackboard, but I don't even think Grace was using it.
Q. Okay. But the room you're talking about is not one of the children's bedrooms, correct.
A. No.
Q. Okay. Now, was that the first time you'd been in that room.
A. No.
Q. When was the first time you went through that room.
A. I mean, because the room wasn't really a classroom. I mean, per se. They would use it as a classroom. There would be stuff there. There would 1882

be -- to use as a classroom. There was like this video game thing there. I think it was in that room. And I think it might have been in the same room as the big train thing.
Q. Was it your understanding that Michael's children are tutored in the main house.
A. My understanding was that they are tutored, but I don't know where.
Q. Okay. Okay. But you don't think it's in that particular room you just described.
A. It probably was. I mean, I'm saying wherever Grace wanted it, they could have it, because it's not like she had a set classroom. It's not like they're going to New York and they're going to come back to Neverland to do their classing, their schooling.
Q. Do you remember approximately when you helped Grace tutor the children.
A. Probably after I came back from Miami.
Q. Okay. Wasn't before then.
A. No.
Q. Okay. Did you see the children tutored the first time you went to Neverland.
A. No. That was the only time I ever saw them, really.
Q. Now, is it true that you introduced Chris Tucker to Michael Jackson.
A. Yes. 1883

Q. And approximately when was that.
A. Well, I think I gave -- it was either I gave Chris Michael's phone number or -- well, I think I gave Michael Chris's phone number, and then I called Chris after a while and I asked him if Michael called him yet, and then he said that he hadn't. And so then I just gave him one of Michael's phone numbers, or I gave him Evvy's phone number, I'm not sure, just so he could do it himself; he can call Michael.
Q. Do you recall ever being in Michael Jackson's bedroom and hearing the alarm go off.
A. The little "dee-do, dee-do" thing.
Q. Yes.
A. Yes.
Q. Okay. Approximately when was that.
A. I don't know. After Miami. I mean, but it's -- because -- I mean, when you're up in his bedroom, like you can hear it, but it's not as good as if you're downstairs, but you can still kind of hear it.
Q. Okay. When you were initially interviewed by the sheriffs, you were asked about what happened after the Bashir documentary was on television, right.
A. Yes.
Q. Now, when did you first hear about the Bashir documentary that appeared on television. 1884

A. On the news and from Michael.
Q. Were you watching the news at home when you first heard about it.
A. I didn't really know that it was the Bashir documentary per se. But I knew that they were talking about kids sleeping in his room or whatever.
Q. Well, you mentioned to the sheriffs about people coming to your house and bothering you, right.
A. Yes. I think so.
Q. And when did that first start.
A. I think after we came back from Neverland.
Q. Okay. You say after you came back from Neverland. When was that.
A. I don't know. I'm not sure.
Q. Well, when you told the sheriffs that people were coming to your house and bothering you, what were you referring to.
A. Well, one time we caught one of Michael's security guys that we thought he was standing in -- trying to stand behind a car, and then my stepdad went out and was like -- asked him what he was doing, and then we saw him run, and --
Q. Well, your mother had asked for security because she said your family was being hassled, didn't she.
A. I don't know if she asked him or -- who are you saying that she asked. 1885

Q. You never heard your mother say she wanted some security because your family was being hassled.
A. No, I knew that she didn't like it, but, I mean, I don't know if she asked for security.
Q. Okay. Okay. We talked last week briefly about all the conversations you had with Michael Jackson at the hospital, right.
A. Yes.
Q. Remember that.
A. Yes.
Q. You had initially testified that there was just one call, correct.
A. Well, it's like -- I don't -- I'm probably sure I called him more than once, but, I mean, the one I'm for sure of is the first time he called me to go up to Neverland for the first time.
Q. You told the sheriffs there were times when you would speak to Mr. Jackson on the phone for hours, right.
A. Yes.
Q. And what did you used to talk about, if you remember.
A. We would talk about, like, video games or people I knew, and people he knew, or a CD he might be trying to do or a song or something, or his life, or my cancer, or Simpsons and Disney cartoons.
Q. And you had a lot of those discussions in the hospital, right. 1886

A. Yes.
Q. And you had discussions after you got out of the hospital, right.
A. We would have discussions, yes. Yes.
Q. And you would have discussions after you got out of the hospital at home, right.
A. They were -- a majority of them, if not all of them, were -- well, the majority of them were at my grandmother's house.
Q. Okay. And would you call Mr. Jackson.
A. Sometimes I would call him, and he would call me sometimes.
Q. Okay. And these conversations would last sometimes a couple hours, right.
A. Yes.
Q. And you said you would talk about cancer. You would talk about the Simpsons. You would talk about video games, right.
A. Yes.
Q. Do you remember anything else you talked about.
A. That's pretty much it right there.
Q. Do you recall your first trip to Neverland.
A. Yes.
Q. And how did you get there.
A. They had us pack all our bags, and then a limousine came in the front of my grandmother's house. And we were all surprised because we didn't 1887

1 think we were going to go up in a limousine. Well,
2 I didn't think I was going to go up in a limousine.
3 I didn't know that we were. And I was really happy,
4 because that was the first time I'd ever been in a
5 limousine. And we threw all our bags in there and
6 then we went up to Neverland.
7 Q. Who told you you were going be picked up to
8 go to Neverland.
9 A. Well, I believe my parents set it up. But I
10 don't know who really told me. I knew what day and
11 I knew Michael wanted me to go up, but, I mean, I
12 didn't really know, like, all the logistical stuff.
13 Q. When you were responding to Prosecutor
14 Sneddon's questions, do you remember discussing Jay
15 Leno.
16 A. Yes.
17 Q. Now, isn't it true that in none of your
18 interviews with the sheriffs and never when you
19 testified before the grand jury on two occasions did
20 you ever mention Jay Leno, correct.
21 A. Yes. Because I thought he didn't have
22 anything to do with this case.
23 Q. Did Prosecutor Sneddon tell you at some
24 point that Mr. Leno had something to do with the
25 case.
26 A. Yes. Well, he asked me about what I know
27 about Jay Leno and how I came about to have him in
28 my -- well, not really have him, but, I mean, how 1888

he -- I don't know how to say it. Like, he pretty much just asked me what I know about Jay Leno.
Q. Did Prosecutor Sneddon tell you that I had mentioned Jay Leno in this courtroom.
A. No.
Q. Did he tell you how the name Jay Leno had come up in the case.
A. No.
Q. When did Prosecutor Sneddon first mention the name Jay Leno to you.
A. Well, actually, it wasn't really -- Mr. Sneddon was there, but I believe it was -- I don't remember who exactly asked me, but I remember him being there, and I remember Mr. Sneddon shaking his head, but I don't think it was Mr. Sneddon that actually asked me.
Q. Do you know approximately when this meeting took place.
A. Before I even -- maybe a day or two before I first came to testify here.
Q. So it was after this trial had started, right.
A. Yes.
Q. Okay. And did Mr. Sneddon call you on the phone to discuss this.
A. No. I met with him.
Q. Okay. Did someone ask you to come meet with Mr. Sneddon. 1889

A. Yes.
Q. Who was that.
A. I don't remember. I remember they told me that I was going to, but I don't remember who exactly.
Q. Do you remember where the meeting took place.
A. In a house.
Q. Okay. Did Mr. Sneddon ask you to testify that Jay Leno was your favorite comedian.
A. No.
Q. Okay. When did the idea that Jay Leno was your favorite comedian come up in this case.
A. Well, Jay Leno was my favorite comedian, but I don't really understand what --
Q. Do you remember calling Jay Leno on the telephone.
A. I remember calling -- yeah, I remember calling his phone.
Q. Do you remember speaking with Jay Leno on the telephone.
A. No, I never spoke with Jay Leno.
Q. At any time.
A. No.
Q. Did you ever try to reach Jay Leno on the telephone.
A. Yes.
Q. And who did you call, if you know. 1890

A. I called a phone number that I was given.
Q. Where did you get the phone number.
A. It was either Jamie Masada or Louise Palanker.
Q. Did you dial the number.
A. Yes.
Q. Was your mother with you.
A. No.
Q. Was anybody in the background.
A. Well, when I called him, I'm pretty sure that I was in the hospital, so either it could have been my dad, or maybe a nurse that would come in to do my vital signs or something.
Q. And you dialed the number, right.
A. Yes.
Q. And do you have any idea who answered the phone.
A. Answering machine.
Q. And did you ever actually get Mr. Leno on the phone.
A. No.
Q. So you deny you've ever spoken to him on the phone, right.
A. I've never spoken to Jay Leno.
Q. Okay. You never mentioned Mr. Leno to Psychologist Stanley Katz, right.
A. No, I don't think so.
Q. And you never mentioned Mr. Leno to 1891

1 Lieutenant Klapakis during any interview, correct.
2 A. No, I've never mentioned Jay Leno to
3 anybody. Except --
4 Q. I'm sorry.
5 A. Except for when they asked me what I know
6 about Jay Leno.
7 Q. To your knowledge, did anybody in your
8 family contact, or try to contact, Mr. Leno while
9 you were ill.
10 A. No. Because I was the only one with the
11 phone number.
12 Q. Did you ever give it to your mother.
13 A. No.
14 Q. Ever give it to your father.
15 A. No.
16 Q. Ever give it to Star.
17 A. No.
18 Q. Ever give it to your sister Davellin.
19 A. Her name is Davellin. But, no, I never gave
20 it to her.
21 Q. Okay. You left a message on his machine,
22 correct.
23 A. Yes.
24 Q. Did you ever get a call back from anyone
25 claiming they represented Mr. Leno.
26 A. No.
27 Q. All right. So what you're saying is if
28 anybody spoke to Mr. Leno and said they were you, it 1892

1 was certainly a false statement, right.
2 MR. SNEDDON: Object as argumentative, Your
3 Honor.
4 THE COURT: Sustained.
5 THE WITNESS: I never spoke to --
6 THE COURT: Just a moment.
7 Next question.
8 Q. BY MR. MESEREAU: Has Prosecutor Sneddon
9 ever discussed with you his conversation with Mr.
10 Leno.
11 MR. SNEDDON: Your Honor, object. Assumes
12 facts not in evidence.
13 THE COURT: Sustained. Assumes facts not in
14 evidence.
15 MR. MESEREAU: I'll rephrase it, Your Honor.
16 Q. Has Prosecutor Sneddon ever told you that he
17 had a conversation with Jay Leno about this case.
18 A. No.
19 Q. Has Prosecutor Sneddon ever told you that
20 any Santa Barbara sheriff had a conversation with
21 Jay Leno about this case.
22 A. No.
23 Q. Never told you that at all.
24 A. No.
25 Q. Okay. Did you hear the alarm in Michael
26 Jackson's bedroom more than once.
27 A. The little "dee-do" sound.
28 Q. The alarm. 1893

A. Yeah, like when Frank would come in or something, you could hear it.
Q. You could hear the alarm go off.
A. Yeah.
Q. How many ringing sounds would you hear.
A. It would go like three times, “dee-do, dee-do,” like three times. And that’s how many ringing sounds it was.
Q. Have you ever discussed that alarm system with your brother Star.
A. Probably. I don’t know.
Q. Did you talk to your brother Star about what he said about the alarm system in this courtroom.
A. No.
Q. Have you discussed with your brother Star anything you said in this courtroom.
A. No.
Q. How many times do you think you entered Michael Jackson’s bedroom when Mr. Jackson wasn’t there.
A. I never went inside his room when he wasn’t there.
Q. To your knowledge, did your brother ever go into his room when he wasn’t there.
A. I don’t think my brother went into his room when he wasn’t there.
Q. Okay. So you have no knowledge of him doing that, correct. 1894

A. No.
Q. Okay. Prosecutor Sneddon asked you questions about your father abusing you and your mother, right.
A. I believe so.
Q. You always refer to David as your biological father, correct.
A. Yes.
Q. Did someone ask you to use that term.
A. No.
Q. How did you start calling him “my biological father”.
A. Because I accepted my now father Jay Jackson as my real father, because he’s more of a father than my real father ever was.
Q. Okay. You testified that Michael Jackson and Frank showed you a computer and went to websites with naked women, right.
A. Yes.
Q. And approximately when was that.
A. That was like on the first night that we were inside his room that we were going to go to sleep.
Q. And you said it was like an Apple computer; is that right.
A. I’m not sure, because I don’t remember -- I think it was Frank’s computer because -- it wouldn’t be mine, because I didn’t set up the AOL account 1895

until, like, after I came back, so it was probably Frank's computer.
Q. Was your computer an Apple computer.
A. Yes.
Q. Okay. You told the sheriffs that it was either your computer or Frank's computer during one of your interviews, right.
A. Yes, sir.
Q. Was Frank's computer an Apple computer.
A. I think it was probably a Sony computer.
Q. And you told the sheriffs that Frank started looking at girls on those sites, right.
A. He started, like, typing up stuff, yes.
Q. Pardon me.
A. Yes.
Q. And did he ask you to join in.
A. No, well, he was -- he had it on his bed and he set it up, and there were -- well, Frank was typing in stuff and looking. And me, Michael and my brother were there.
Q. Is that when you say that Michael Jackson looked at a naked girl on the computer and said, "Got milk."
A. Yes.
Q. Okay. Now, to your knowledge, did Michael Jackson or Frank ever show you a website on a computer like that at any other time.
A. I don't think so. 1896

Q. Was that the only time.
A. I believe so.
Q. Okay. And Frank's the one who initially was pressing the buttons to look up the site, correct.
A. Yes.
Q. Okay. You also testified that at some point Michael Jackson showed you some girlie magazines, right.
A. Yes.
Q. And I believe you mentioned Hustler and Playboy to the sheriffs, right.
A. Yes.
Q. Okay. You also testified that at some point Michael Jackson pretended that he was having sex with a female mannequin, right.
A. Yes.
Q. Okay. And you also told the jury that at some point Michael Jackson mentioned the word "clitoris," or "clitoris," right.
A. I don't think I did.
Q. Did you testify to that.
A. (Shakes head from side to side.)
Q. Ever tell the sheriffs that.
A. No.
Q. Okay. And your testimony to the jury is that after Michael Jackson showed you women on websites, after he showed you Hustler and Playboy, which are girlie magazines, and after he pretended 1897

1 to have sex with a female mannequin, he then at some
2 point masturbated you; is that correct.
3 A. Yes.
4 Q. Is that what you told the sheriffs.
5 A. Yes, I told the sheriffs about that.
6 Q. Now, at some point, you went to the Hilton
7 Hotel to visit Michael Jackson, right.
8 A. Yes.
9 Q. And approximately when was that.
10 A. I was in my second round of chemotherapy.
11 Q. And you were with your father, right.
12 A. Yes.
13 Q. And you say that was around the time of your
14 second round of chemotherapy.
15 A. Yes.
16 Q. And who invited you to the Hilton Hotel.
17 A. It was either I called Michael or Michael
18 called me, and I asked him where he was. And then
19 he told me that he was in -- more like near --
20 around L.A. And then I asked him -- I think I asked
21 him -- yeah, I asked him if I could visit him.
22 Q. Okay.
23 A. And then he said it was okay. And so I went
24 up there and visited him for like two hours.
25 Q. And how long were you there.
26 A. Two hours.
27 Q. Okay. With your dad, right.
28 A. My dad was in another room. And then with 1898

me and Michael, we were in his bedroom with Prince and Paris, and we were watching Aaron Carter's music videos.
Q. And Prince and Paris were there the whole time, right.
A. Yes.
Q. How did you get to the Hilton.
A. My dad drove me there.
Q. And he drove you in an SUV that Michael Jackson had given your family, correct.
A. Yes.
Q. Do you know when Michael Jackson gave your family that SUV.
A. I think it was like right after my second round of chemotherapy, Gary came and -- I think he was going to drive me up from Neverland right after my second round. And then once I went in -- he drove me up in the truck, and then I walked up to the truck, and I was like, "Is this Michael's truck." And he was like, "Yeah."
And I said, "Wow, my grandfather has one that looks exactly like this one."
And Gary was like, "Well, this one's yours now."
Q. That was Gary Hearn.
A. Yes.
Q. Okay. And just -- Gary Hearn was an employee of Mr. Jackson's, correct. 1899

A. Yes.
Q. And you're telling the jury that Gary Hearn told you that your family owned the SUV, right.
A. He told me that Michael gave it to us.
Q. Okay. And did he leave it at your house, to your knowledge.
A. No, we were coming -- it was in the garage of the hospital, and I went in there, and there's like a little bow in the center console between the two seats and stuff.
Q. You complained to the sheriffs that someone had taken that truck back, right.
A. Yes. I said I believe so.
Q. You complained to the sheriffs that your family thought it was their truck, and at some point someone representing Mr. Jackson took the truck back and never returned it to you, right.
A. Um, I think it was that we had the truck and somebody crashed into it or something. And then we had asked Michael if they can fix it and give it back to us. And then we gave it -- we -- they had it, they got the truck so that they can fix it and give it back to us, and they never gave it back to us.
Q. Who crashed the truck.
A. I don't think it was someone -- I think someone crashed into it.
Q. Do you know who was driving it at the time. 1900

A. I think it might have been parked. I'm not sure. I don't really know how it happened exactly.
Q. It might have been who.
A. It might have been parked while it went -- and someone, like, ran into it or something, because I don't really remember how exactly --
Q. Yes, but somebody ran into it while your family had possession of it, right.
A. Yes, well, we owned it.
Q. When you owned it, right.
A. Yes.
Q. And at some point, someone in your family asked if Mr. Jackson would pay to repair it, correct.
A. I'm pretty sure. I mean --
Q. Pardon me.
A. I'm pretty sure.
Q. All right. Let me just make sure I understand. You're pretty sure that someone in your family asked if Mr. Jackson would pay to repair the SUV that you claimed he gave your family, right.
A. Yeah. Because, I mean, it had to have been like that, because the guy came to fix it.
Q. And you did complain to the sheriffs that the truck was never returned to your family, correct.
A. Yes.
Q. Because you believed that your family owned 1901

the truck at that point, right.
A. Because Michael said he -- well, Gary said that Michael said he gave it to me. And then I called Michael later to thank him, and he said, "Yeah, it's your truck now."
Q. Okay. People in your family -- well, I shouldn't say that. You were personally upset about that, right.
MR. SNEDDON: Excuse me, vague as to what "that" is.
MR. MESEREAU: I'll rephrase it.
Q. You were upset that your family never got that truck back, correct.
A. I was more sad because then we didn't have a vehicle to use to go anywhere.
Q. Okay. Do you recall ever asking Chris Tucker for a vehicle.
A. No.
Q. Do you know of any member of your family ever doing that.
A. No.
Q. Okay. Never heard of anything like that.
A. I remember Chris gave us -- was going to give us a vehicle.
Q. And what happened.
A. It never was able to -- I mean, someone lost the key and something like that, and that was the only key, and then -- and then I think all this 1902

1 stuff started.
2 Q. So you never got a vehicle from Chris
3 Tucker, right.
4 A. No.
5 Q. Were you upset about that.
6 A. Well, I mean, I was kind of sad, but I
7 mean -- yeah, I mean, it's like he was going to give
8 it up, that would be nice, so I don't really have
9 that much of a right to be angry.
10 Q. Okay. Now, you complained to the Santa
11 Barbara Sheriffs that, "After I was done with my
12 cancer stuff," you never saw Michael again, right.
13 A. No, not until the Martin Bashir thing.
14 Q. Okay. And you wanted to see him after you
15 were in remission, correct.
16 A. Yes.
17 Q. You wanted to visit Neverland after you were
18 in remission, right.
19 A. Yes.
20 Q. And you felt in some way that Michael had
21 cut off the friendship, right.
22 A. Yes.
23 Q. You felt he had abandoned you, right.
24 A. Yes.
25 Q. And you felt he had abandoned your family,
26 right.
27 A. Yes.
28 Q. Now, at some point you told the sheriffs 1903

1 that Michael had given your family a Bronco,
2 correct.
3 A. I believe -- I'm pretty sure that the GMC
4 was called Bronco.
5 Q. Are you sure about that.
6 A. I'm not exactly sure what kind of truck it
7 was.
8 Q. You also complained to the Santa Barbara
9 Sheriffs that your computer had gotten messed up,
10 right.
11 A. I think I did. The battery stopped working.
12 It wasn't -- the computer just wouldn't turn on. It
13 would always stay black.
14 Q. This was the computer that Michael Jackson
15 had given you, right.
16 A. Yes.
17 Q. And at some point you asked to have Michael
18 Jackson fix the computer, right.
19 A. Well, I told my mom about it. And then my
20 mom said, well, we could probably call Evvy and they
21 can help us fix it.
22 And then I called Evvy and asked her if they
23 can fix it for me. And Evvy said yes. And then so
24 we mailed it to her or dropped it off or something
25 like that, and then I never got it back.
26 Q. Well, actually, your mother asked Evvy if
27 Michael Jackson would fix the computer, right.
28 A. I don't know who exactly asked. 1904

Q. Well, you told the sheriffs that your mother had asked, didn't you.
A. I don't know.
Q. Would it refresh your recollection if I just show you a page of the transcript of your interview.
A. Yes.
MR. MESEREAU: Okay. May I approach, Your Honor.
THE COURT: Yes.
Q. BY MR. MESEREAU: Have you had a chance to look at that page --
A. Yes.
Q. -- of your police interview. Does it refresh your recollection about what you told Santa Barbara Sheriffs.
A. A little bit. I mean --
Q. You told him that your mother asked to have the computer repaired, right.
A. Yes. But as I told you, I'm not -- as of right now -- I mean, that interview took place a while ago. I mean, I'm not sure who exactly called. But in the transcript it says that, so that's probably what happened.
Q. Okay. Is it your belief that your mother called Evvy.
A. I believe so.
Q. Your mother used to call Evvy a fair amount, didn't she. 1905

A. I don't know.
Q. Did you ever see your mother call Evvy.
A. Maybe once or twice.
Q. Not -- no --
A. Maybe -- I'm pretty sure I saw her call for the computer, because I asked her. And I'm not sure exactly how many times she called Evvy.
Q. And you complained to the Santa Barbara Sheriffs that you never got the computer back, right.
A. Yeah, I told them that I didn't get the computer back.
Q. Did you used to communicate with Evvy by e-mail.
A. I don't know. I don't think I did.
Q. Okay. Are you sure about that.
A. No.
Q. Okay. Did you know how to use e-mail at that point.
A. A little bit. I mean, it was kind of hard. Well, it wasn't really hard. I just didn't really understand it at first, and then I got the hang of it, but --
Q. You indicated at the Hilton you watched music videos with Mr. Jackson, right.
A. Yes.
Q. And do you know why Mr. Jackson was at the Hilton. 1906

A. I think he was doing some recording thing.
Well, yeah, he told me that he was going to do some recording in Los Angeles, or something like that.
Q. And at some point you complained to the sheriffs that Mr. Jackson had changed his phone numbers after you visited the Hilton, right.
A. Well, that was the only phone number I left -- or I called -- well, I'm not sure. Because the only phone number that never changed was Evvy's phone number. And I would call her and I would ask her sometimes where Michael was or something. And then -- and I had the phone number to his hotel, so I think I called him at his hotel and asked him if I could go visit him. I think it was around -- I'm not sure when exactly.
Q. When did you first get upset about your phone numbers for Michael Jackson not working.
A. Maybe around the third or fourth chemotherapy round I called his numbers and it would be, like, "This phone number is no longer in service." Or sometimes it would just ring and it wouldn't never -- no one would ever pick up or something like that.
Q. This was after your cancer was in remission.
A. No, this was around the third or fourth cancer -- round of chemotherapy.
Q. Suddenly his phone numbers didn't work, right. 1907

A. Yes.
Q. And did you try to get ahold of phone numbers that would work.
A. I don't know.
Q. Well, you've indicated that you were upset that the phone numbers you had for Mr. Jackson at some point didn't work, right.
A. Yes.
Q. And the phone numbers you had for Mr. Jackson began to not work after it appeared that your cancer was in remission, correct.
A. No, I said they stopped working after my third or fourth chemotherapy round.
Q. Okay. Before that, could you easily call him.
A. Yes.
Q. And before that, did you often call him.
A. Yes. And he would call me and stuff. We would talk -- we talked a lot more before then.
Q. In fact, you called him at the Universal -- Hilton Universal the day you visited, right.
A. I believe so. I'm not too sure how it came about.
Q. Who did you complain to about your phone numbers to Mr. Jackson not working.
A. I didn't complain to anybody.
Q. Ever mention it to your mother.
A. I'm pretty sure I did. 1908

Q. Ever mention it to your brother and sister.
A. I'm pretty sure I did -- well, the first person I told was my biological father, and then -- because he was usually the one always with me like when we would go up to Neverland or go with me to -- with Chris or something.
Q. So you complained to your biological father David that around the time of your third chemotherapy treatment the phone numbers you had for Michael Jackson were not working, right.
MR. SNEDDON: Your Honor, I'm going to object to the question, the use of the first part of it, because I believe that's not his testimony, so it assumes facts not in evidence.
THE COURT: Overruled.
You may answer. Do you want the question read back.
THE WITNESS: Yes.
(Record read.)
THE WITNESS: I didn't really complain. I mean, I was in the hospital, and -- I was either in the hospital or at my grandmother's house or something. And I told my dad that -- I told my biological father that they weren't working anymore.
Q. BY MR. MESEREAU: Well, when you first started talking to Michael Jackson in the hospital, you talked to him about your cancer, right.
A. Yes. 1909

Q. And he used to talk to you about ways to deal with it, right.
A. Sometimes he would, yes.
Q. And he tried to encourage you to believe in yourself and you could heal, correct.
A. Yes. He would tell me that like -- that -- to -- like this one time he told me to eat up cancer cells like a Pac Man. Something like that.
Q. And what he told you was to sort of visualize in your mind Pac Man eating up bad cancer cells, right.
A. Yes.
Q. Did you do that.
A. Not really.
Q. Did you ever try to visualize.
A. Well, yeah, I think I did once, but I mean --
Q. Now, when you had your third chemotherapy treatment, you were getting encouraging signs from the doctor, right, about beating cancer.
A. Yes.
Q. And you were being told that it looked like you might beat this thing, right.
A. I didn't really get told that until my fifth chemotherapy round where they had that CT scan.
Q. But didn't you complain to the Santa Barbara Sheriffs that after your cancer was over, Michael stopped communicating with you. 1910

A. It wasn't after my cancer. It was toward the beginning of my third chemotherapy round.
Q. You told them, "After I was done with my cancer stuff," you couldn't call Michael anymore, right.
A. I couldn't call Michael either at that period, or the period when I had cancer.
Q. Okay. When you were undergoing chemotherapy, you visited Neverland with Chris Tucker on a couple of occasions, correct.
A. I don't know if it was during my cancer. I think it was -- I visited him after. I don't know.
Q. Approximately when was that, if you know.
A. I went up there with his birthday for Dustin, so whenever his birthday is.
Q. I'm sorry, I can't hear you.
A. I went up there whenever his birthday was, whenever Dustin's birthday was. But I don't know what came first, either the Martin Bashir thing or Dustin's birthday. I'm not sure.
Q. And Michael Jackson wasn't there, right.
A. No.
Q. Do you know how that trip got arranged.
A. Which trip.
Q. The trip with Chris Tucker to Neverland when Michael Jackson wasn't even there.
A. Well, I'm not sure if Dustin -- well, if it was Dustin's birthday or Chris's -- or, I mean, the 1911

Martin Bashir thing. So I'm not -- I don't know how it got arranged that we'd go up there. I mean, I don't -- like -- I don't really know whether it was like a limousine or something.
Q. But you don't know who set that up, right.
A. Not exactly. Well, the -- I think the Martin Bashir thing I went up there with Chris. And then with the Dustin thing, I went up there in Chris's bus with a bunch of other people, his family and stuff.
Q. Are you telling the jury that when you did the Martin Bashir filming, Chris Tucker was with you.
A. Um, I'm -- I don't know whether he drove me up there or not. I -- because I'm not too sure how, like, all this stuff -- how I got up there. But I know I went up there with Chris for Dustin's birthday.
Q. Do you remember Chris being there when you were filmed for the Bashir documentary.
A. I don't know, because I think I might have went up there with Chris, because I remember going up there with Chris one time when we were riding horses, and then he was wearing like this -- this thing that like only like sheiks would wear, and he was joking around, and we were all riding horses and stuff. And I don't know -- I think it might have been around the time that I was -- that Martin -- 1912

1 that the Martin Bashir thing got filmed.
2 Q. To your knowledge, Chris Tucker wasn't in
3 the Bashir documentary, right.
4 A. No.
5 Q. Did you leave Neverland after that visit
6 with Chris.
7 A. After -- well --
8 MR. SNEDDON: Excuse me, I'm going to object
9 as vague as to "that visit." We've discussed a
10 couple of them.
11 MR. MESEREAU: I'll rephrase it.
12 THE COURT: All right.
13 Q. BY MR. MESEREAU: When you were at Neverland
14 to film what became part of the Bashir documentary,
15 at some point you went home, right.
16 A. Yes.
17 Q. And did you go home with Chris Tucker.
18 A. No. We stood there and we went swimming and
19 stuff.
20 Q. What was the state of your cancer when you
21 filmed what became part of the Bashir documentary.
22 A. The Martin Bashir interview thing.
23 Q. Yes.
24 A. I was in remission.
25 Q. And for how long had you been in remission
26 at that point.
27 A. I'm not sure when it was filmed. So I'm not
28 sure how long. 1913

Q. Do you know if it was a number of months.
A. Yeah. Definitely.
Q. At that point, could you reach Michael Jackson by telephone if you wanted to.
A. No, after the Martin Bashir thing, he didn't give me any phone numbers, because he left, like, either the same day or the day after the Martin Bashir interview, and I didn't really get any other phone numbers.
Q. But your phone numbers for Michael Jackson stopped working before the Bashir documentary, didn't they.
A. Yes. Michael called me to go up to Neverland. He said that he was trying to find me or something like that to go -- for him to talk to me, and then he wanted me to go up to the Martin Bashir -- well, he didn't tell me that. He told me he wanted me to go up to his ranch and visit him.
Q. You hadn't been able to call Michael Jackson by phone for many, many months before you were filmed in the Bashir documentary, right.
A. No, I was not able -- well, I didn't have a phone number.
Q. Okay. Now, in the year 2001, you don't recall ever going to Neverland, right.
A. No.
Q. You started going in the year 2000, right.
A. Yes. 1914

Q. You didn't go there in the year 2001, right.
A. I don't think I did.
Q. And at some point you heard from Michael Jackson and went there for the Bashir filming, right.
A. Yes.
Q. Now, you visited Neverland a number of times in the year 2000 with your biological father, correct.
A. Yes.
Q. And do you remember if Michael Jackson was there during those visits.
A. I think he was there for the -- I think he was there once. The first time I went there he was there. And then I think the second time I went there, he was there and then he had to leave.
Q. When your father was at Neverland with you, did you ever stay in Michael Jackson's room.
A. No, I only stood on the first night, and then the rest of the nights I just stood in, like, the units and stuff.
Q. And when you say you stayed there the first night, is that the night you described where Michael Jackson and Frank slept on the floor, and you and your brother slept on the bed. Is that what you're talking about.
A. Yes, I believe so.
Q. And is it your testimony that that first 1915

visit, you had dinner in the main house with your family and Michael Jackson.
A. Yes.
Q. And during that dinner, was there a discussion about whether or not you and Star could sleep in Michael Jackson's room.
A. The first day.
Q. Yes.
A. Yeah. Like, we were in Michael's office and then we were talking about stuff, and then Michael told me to ask if I could go sleep in his room so we can watch, like, movies and stuff.
Q. Was there a discussion at the dinner table that evening with your parents and Michael Jackson about whether or not you could stay in his room.
A. Yes. Michael told me to ask my parents in front of him and my parents.
Q. Did you ask your parents in front of Mr. Jackson at the dinner table that evening.
A. Yes.
Q. Did your parents both approve you and your brother staying in Michael Jackson's room.
A. Yes.
Q. And that's the night you say Michael and Frank slept on the floor, right.
A. Yes.
Q. Did you ever ask either of your parents after that whether you could stay in Michael 1916

Jackson's room.
A. I don't think so.
Q. You don't think you ever asked them that question again.
A. I think it was like we only stood there that one night, and then after that, we stood in our units or something. Because I think that's the only night I slept in his room, the first night.
Q. Okay. You said after that, you had stayed in the guest units.
A. Yes.
Q. And are the guest units where your mother was staying.
A. Well, there's a lot of guest units, so I think me and my brother had a room. Me and my brother and my sister had a room, and my mom and my dad had another room.
Q. Okay. And you and your brother would stay in those guest units, right.
A. Yes.
Q. And approximately how many of those trips to Neverland do you think you and your brother stayed in the guest units.
A. After that first night we would stay in there every night we would go there, every time, or sometimes we would go to the train house and sleep up there.
Q. You'd sleep in the train house. 1917

A. Yeah.
Q. Please tell the jury where the train house is.
A. It's on top of a -- like you come -- like the guest units are right here, and you go up the side of this hill, and then up there there's like this train station. And then you can sleep in there, because there's, like, couches, and you can roll out a bed, and then there's a T.V. there and stuff. It was pretty cool.
Q. How many times do you think you and your brother stayed in the train house.
A. A few nights, I guess.
Q. When you visited Neverland with Chris Tucker, did you stay in the train house.
A. Yeah. I think so. I think that's the time that we stood in the train house.
Q. Do you know where Chris Tucker stayed when you visited Neverland with Chris Tucker.
A. No.
Q. Did you ever go into his room.
A. I think we might have. I don't know. I mean, I don't know where he stood right as of now. I mean, I don't remember, but I don't -- I think we went into his room to, like, say, "Let's go do this," or something like that.
Q. Let me ask you this: After the first night your family was at Neverland, when do you next

1 remember your mother visiting Neverland.
2 A. Not until after we came back from Miami.
3 Q. So you don't think your mother ever visited
4 Neverland between your first visit in the year 2000
5 and right after the Miami trip.
6 A. Yes. I don't think she did.
7 Q. Okay. You don't recall her being there at
8 all.
9 A. No.
10 Q. Okay. And you recall your father being
11 there once or twice.
12 A. No, I recall my father being there every
13 time I went up there.
14 Q. And how many times was that.
15 A. When I had cancer, it was -- well, he went
16 up there every time that I had cancer. And he
17 was -- I'm not sure how many times I stood there.
18 That was -- because I think I stopped going out
19 there after my fourth chemotherapy round. And so it
20 was -- probably we went there, like, four or five
21 times, or something like that, yeah.
22 Q. At some point you learned about the Bashir
23 documentary by watching television, right.
24 A. Well, I didn't really know it was the Bashir
25 documentary until I -- we started talking about it
26 more with Chris, and stuff like that.
27 And I just remember watching the news and
28 they were talking about kids and Michael, but I 1919

didn't really know they were talking about the Martin Bashir documentary.
Q. Well, you were watching CNN, correct.
A. I think I was. I don't know.
Q. And at some point you saw a reference to yourself being in the Bashir documentary, right. Is that true.
A. I didn't know it was the Bashir documentary, but they said -- I personally thought it was some guy that was saying stuff about Michael. And they were talking -- I thought they mentioned my name when they were talking about Michael. But I didn't know it was the Martin Bashir documentary until, like, we started talking to Chris and stuff.
Q. But you told the Santa Barbara Sheriffs your name was mentioned a lot, correct.
A. No, I think I only told them my name was mentioned maybe -- I don't think "a lot." But, I mean, I did think my name was mentioned.
Q. You told the sheriffs, "Because on, like, CNN and stuff, they started saying, like, Gavin -- Gavin this and Gavin that, right.
A. I don't remember. I mean, I guess I did, because it's in the transcript.
Q. Were they really mentioning your name on the newscasts.
A. Yes.
Q. How many times did you hear your name 1920

1 mentioned on the newscasts.
2 A. Three or four times. I don't know.
3 Q. Did you -- were you watching that with your
4 mom.
5 A. Yes. Our whole family was watching it.
6 Q. And generally speaking, would you say your
7 family was upset.
8 A. Yes.
9 Q. Okay. And do you recall your mother ever
10 calling up Michael Jackson to talk about it.
11 A. No. I remember Michael calling us.
12 Q. Do you recall your mother ever discussing
13 the fact that you had legal rights regarding that
14 show.
15 A. No. I mean -- the Martin Bashir thing.
16 Q. Yes.
17 A. No.
18 Q. Do you recall your mother ever discussing
19 her claim that she never gave permission for you to
20 be on a show.
21 A. Oh, yes. I remember that.
22 Q. Okay. And when is the first time you heard
23 your mother complain about her not giving proper
24 permission for you to be on the show.
25 A. I don't remember.
26 Q. Do you recall ever going to a lawyer with
27 your mother to discuss your legal rights in that
28 regard. 1921

A. Hmm, I'm not sure.
Q. Do you remember discussing that with
Attorney Bill Dickerman.
A. Oh, yeah, yeah. We went to The Laugh
Factory and we talked to Bill. My mom was talking
to him. I mean, I was, like, playing around or
something. I was -- like, with the microphone.
Q. And the discussion concerned, among other
things, the fact that you had legal rights in that
documentary, right.
A. I guess. I mean, I wasn't really paying
attention. I was kind of bored.
Q. Okay. Do you recall -- do you remember the
rebuttal video.
A. Yes.
Q. Do you remember you went to Hamid's home to
film the rebuttal video.
A. Yes.
Q. Do you remember discussions before you
filmed that video about whether or not your mother
was going to sign a release.
A. Not too sure.
Q. Do you remember anything like that.
A. No.
Q. You claim that Michael Jackson called you on
the phone and said there's going to be a press
conference in Florida, right.
A. Yes. 1922

Q. Did you want to be in a press conference.
A. Yeah. I wanted to, like, say that Michael was a good guy and stuff.
Q. And you were disappointed when you got to Florida and no press conference took place, right.
A. I guess. But, I mean, I was still kind of having fun, so it wasn't that big of a deal to me.
Q. I couldn't hear what you said.
A. I was still having fun, so it wasn't really that big of a deal to me.
Q. Well, you thought that you were going to Florida to appear in a press conference with Michael Jackson, correct.
A. Yes.
Q. You flew on Chris Tucker's plane to Florida, right.
A. Yes.
Q. You stayed at a luxury hotel, right.
A. Yes.
Q. You came back a couple of days later, right.
A. We went right to Neverland after we came back.
Q. And there never was a press conference that you appeared at in Florida, right.
A. No.
Q. And that upset you, didn't it.
A. Um, as I said, not really. Because it wasn't -- I mean, I thought we were. I mean -- and 1923

then he said that we're not going to. Well, he didn't really say that we're not going to. I mean, it never really happened, so it's like -- I was like, "Okay, whatever." I mean -- and I was still having fun playing around and stuff, playing video games and stuff.
Q. When you were in Miami, you stayed with your mom in a room, right.
A. Yes.
Q. That was at the Turnberry Hotel, right.
A. Yes.
Q. That was a floor below Michael Jackson's suite, true.
A. I don't know.
Q. It wasn't a floor below.
A. I said that I don't know.
Q. Do you remember your mother ever complaining that she wanted to be in Michael Jackson's suite.
A. No.
Q. Never heard anything like that.
A. No.
Q. And you say you never stayed overnight in Mr. Jackson's room at the Turnberry in Miami, right.
A. No. I never stood in his room.
Q. Do you remember telling the Santa Barbara Sheriffs that Michael Jackson first touched you inappropriately during your last days at Neverland.
A. Yes. 1924

Q. Were you telling the truth.
A. Yes.
Q. This was shortly before Vinnie drove your family to your grandparents', right.
A. Not -- well, it was like a week or -- probably two weeks before Vinnie drove us back.
Q. Well, you said to the sheriffs it was during the last days at Neverland, right.
A. Well, days equals -- seven days equals a week, so it could be days. So, I mean, it was more like a week or two.
Q. We'll get to that.
Did you discuss over the weekend with Prosecutor Sneddon exactly when you say this inappropriate touching took place.
A. No. Not over this -- no.
Q. Did you have any discussion at all with the prosecutors last night about when you say the inappropriate touching took place.
A. No.
Q. Okay. Now, when you claim you were masturbated, were you wearing pajamas.
A. Yes, I was wearing Michael's pajamas.
Q. Okay. Now, clearly during the last days at Neverland, you and your family, from what you say, wanted to leave, right.
A. Well, my mom always wanted to leave. I wanted to stay, because I was having lots of fun, 1925

1 but my mom was always really worried.
2 Q. Well, at some point you say you escaped from
3 Neverland, right.
4 A. Yes.
5 Q. You've told the jury you escaped a couple of
6 times before the final escape, which was when you
7 left for good --
8 A. Yes.
9 Q. -- right.
10 A. Yes.
11 Q. So what you are telling this jury is that
12 after a couple of escapes, and following your return
13 from those escapes, you claim you were
14 inappropriately touched. That's what you're saying,
15 right.
16 MR. SNEDDON: Object as argumentative, Your
17 Honor.
18 THE COURT: Overruled.
19 You may answer. Do you want the question
20 read back.
21 THE WITNESS: Yes.
22 (Record read.)
23 THE WITNESS: Yes.
24 Q. BY MR. MESEREAU: Now, you told the sheriffs
25 that after Miami, you slept in Michael Jackson's
26 room every night, right.
27 A. I slept in his room every night that Michael
28 was there. 1926

Q. And this would include visits when your mother was staying at Neverland, correct.
A. Yes.
Q. Are you telling the jury that you never discussed your staying in Michael's room with your mother.
A. Not really, because my mom was always in her unit. She was never outside or with us really. I mean, so we would just go into Michael's room.
Q. Are you telling the jury that your mother never asked you, during any of those visits, "Where are you spending the night."
A. Not really, because I think she thought we were sleeping in our unit. I mean, because she was always in her unit.
Q. Are you telling the jury your mother never left her unit at any time after the Miami trip.
A. She probably left a few times, but, I mean, mainly she was always in her unit.
Q. And how many nights do you think you spent in Michael Jackson's room after the Miami trip.
A. I'm not sure because, I mean, every time that Michael was there, me and my brother would be in his room.
Q. And you never had one discussion with your mom at any time after Miami about where you were staying at night.
A. I might have. I don't think I did. I'm 1927

pretty sure that I didn't, because she was never
really involved in what we were doing at Neverland.
Q. And you've told the jury that you and your
brother were drinking every single night, right.
A. Every night that Michael was there.
Q. You were drinking alcohol every single night
that Michael was there; is that what you're saying.
A. Yes.
Q. Okay. How about the nights that Michael
wasn't there.
A. We wouldn't drink. I mean --
Q. Well, you and your brother were caught by
employees at Neverland drinking when Michael wasn't
there, weren't you.
A. No.
Q. Never happened.
A. No.
Q. No one ever walked in the wine cellar at
Neverland and caught you and your brother drinking
when Michael wasn't there.
A. No.
Q. Did you know where the key was to the wine
cellar.
A. No.
Q. To your knowledge, did your brother know
where the key was to the wine cellar.
A. I don't think he ever knew. He was always
with me everywhere we went. 1928

Q. Did you ever learn where the key was to the wine cellar.
A. No.
Q. To this day, you don't know.
A. To this day, I don't know.
Q. Never discussed it with your brother.
A. No.
Q. Okay. Now, correct me if I'm wrong, you've told the jury -- excuse me, let me rephrase that. You've told the sheriffs that Michael Jackson would give you and your brother Bacardi, right.
A. That was one of the things he gave us, yes.
Q. That was rum, right.
A. Yes.
Q. And you also said he'd give you Skyy Vodka, right.
A. Yes.
Q. Jim Beam, which was bourbon, right.
A. I don't know what it is, but, yes.
Q. And red and white wine, right.
A. Yes.
Q. Did you drink all this stuff at once.
A. No, it was over the whole period of time that we were over there.
Q. Okay. But never once did you taste any of this stuff when Michael wasn't there.
A. No.

Q. Okay. Never took any alcohol out of the refrigerator in the kitchen, right.
A. No.
Q. Never got caught taking alcohol out of the refrigerator in the kitchen, right.
A. I never took any alcohol out of the refrigerator in the kitchen.
Q. To your knowledge, was your brother ever caught taking alcohol out of the refrigerator in the kitchen.
A. I was always with him during the day, so no, he didn't.
Q. Okay. Now, you told the sheriffs at some point your mother was scared and wanted to leave Neverland, right.
A. My mom was scared, like, the whole time.
Q. Did you discuss your mother being scared with your mother at Neverland.
A. Yes.
Q. Did you have talks with her about it.
A. Yes.
Q. And at no time during any of those discussions did where you and Star were sleeping at night come up.
MR. SNEDDON: Object as asked and answered, Your Honor.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You talked about a black 1930

suitcase. Do you remember that.
A. Yes.
Q. When did you first see the black suitcase.
A. The same night that we came back from Miami.
Q. And this is right after the Miami trip.
A. Yes.
Q. The first night you're back.
A. Yes.
Q. And when did you first see it.
A. In Michael's, like, bathroom room, and, like, he had all this stuff. Like he had, like, a sink and a bathtub and a mirror and stuff.
Q. Before I explore that subject, you've talked to the jury about Michael Jackson giving you a watch that you claim he said was worth $75,000, right.
A. Yes.
Q. And that's the watch you claim that others wanted to get back from you, right.
A. Oh, yes. Like the -- I think Frank wanted me to give it back or something like that.
Q. So after the Miami trip, you had the watch, right.
A. Yes.
Q. You claimed that Mr. Jackson told you it was worth $75,000, right.
A. Yes.
Q. Were you wearing it.
A. Yes. I believe so, yes. 1931

Q. And did Frank or someone else notice the watch, to your knowledge.
A. Yeah. Yes.
Q. Did you discuss the watch with Frank.
A. Not really in -- I think Chris -- I mean, Frank wanted me to give it back. And then I told Michael, and Michael was like, "No, no, that's your watch. I gave it to you."
Q. And did you have a discussion with Frank about whether you should return it.
A. Frank, I think, wanted me to return it, and Michael told me not to.
Q. At some point, did you ever complain to anyone that that watch was not worth $75,000.
A. No. I always thought it was worth $75,000.
Q. Did you ever learn at some point it wasn't.
A. No.
Q. To this day, is that what you think.
A. I'm pretty sure that's how much it's worth.
Q. Okay. Do you recall the Make a Wish Foundation.
A. Yes.
Q. Did you have experience with them.
A. Yes.
Q. What is your experiences with Make a Wish Foundation.
A. They called me up because I have cancer. They do it for everybody that has -- every child 1932

that has cancer. And then they call you up and say that, "You have one wish," and they tell you that, "Pretend I'm the genie, and you have one wish that you can have."

And then I asked them -- first I asked -- I wanted a dog, like a little puppy, a beagle, but my, like, dad -- my parents said that I can't have a beagle because it can get me sick. So I ended up just asking for a vacation.

Q. And did you obtain any benefits from that foundation; do you know.

A. Just a vacation.

Q. They paid for a vacation.

A. Yes.

Q. And approximately when was that.

A. Well, the doctor said to not go, because I would have -- because I had -- like, it was such a big amount of chemotherapy, that it would wipe out every single one of the blood cells that I had. So I would -- it would be bad if I get a fever, because I was getting lots of fevers, because my white blood cells can't fight it because they're so little. And I would have to go in the hospital, and then they'd have to give me antibiotics.

And if I was over in Hawaii, and I got a fever because of some bacteria or something that was in me, I -- I wouldn't be able to go back, and then I would get really sick. 1933

Q. Did Michael Jackson ever help you make contact with that foundation.
A. No, I don't believe so. I believe the hospital social worker did.
Q. Do you recall ever discussing with Mr. Jackson the Make a Wish Foundation.
A. I think I asked him if he donated money to the Make a Wish Foundation.
Q. Do you recall what he said.
A. He said that he did.
Q. Okay. Do you know when you discussed that with him.
A. I think it was like when he was doing the rebuttal thing, when he was getting ready to do the rebuttal. He was writing down all the foundations that he ever donated to.
Q. And did you have a discussion with him about that.
A. Not really. I mean, I saw him -- I mean, we were talking about it, or whatever, and then we were like, "Okay, okay," and then we left and we were playing some more.
Q. Okay. Now, you mentioned on your first day of testimony that when you showed up for the Bashir filming, there was some discussion about a burn victim.
A. Yes.
Q. Tell the jury what that was about. 1934

A. Well, there was a boy there that had gotten burned really bad, and then Michael said that he helped him or something. And then that he was going to -- that he was going to film him, too. So --
Q. Were you supposed to be in the same film.
A. Yeah. Yes.
Q. And did you have a discussion with Michael about that subject.
A. About me being in there.
Q. Yes.
A. Yes.
Q. Okay. Did you ever meet this person who was burned.
A. Yeah, I think Michael introduced me to him.
Q. And when was this.
A. Around the same time as the Martin Bashir thing.
Q. Was it at Neverland.
A. Yes.
Q. Did you talk to this person.
A. Yes.
Q. Do you remember the person's name.
A. I think his name might have been David.
Q. Was it Rothenberg.
A. I don't know.
Q. Was this a young man that you learned's father had poured gasoline on him and set him on fire. 1935

A. I don't know.
Q. Okay.
A. I think that's what happened.
Q. And he was supposed to be in the film with you, right.
A. Yes.
Q. Okay. And correct me if I'm wrong, you discussed with Michael the fact that Michael had helped this young boy, right.
A. Yes.
Q. Okay. Did you talk to this young boy about what he had experienced.
A. No.
Q. Okay. Did you ever see him.
A. Yes.
Q. And please describe for the jury what he looked like.
A. He looked like he was really badly burned and he had like -- he was like a rocker. He was wearing, like, rocker stuff. And he was burned. And he had like only a few hairs on his head because I guess it covered all the pores when he was burned.
Q. Did you and he appear in the film, if you know.
A. Later I watched it, and then -- well, I watched my part, and then I don't think he was in there.
Q. Okay. But was he at Neverland the day you 1936

were filmed.
A. Yes.
Q. Okay. Did you meet him shortly after you arrived.
A. Yes.
Q. Okay. Did you and he walk around Neverland.
A. No. I don't think so.
Q. How much time did you spend with him.
A. Michael introduced me to him and he was older than me, so I mean -- I was pretty young. I mean -- I don't know. We just didn't really have that much in common that much.
Q. Okay. Were you ever personally threatened by anyone associated with Mr. Jackson.
A. No.
Q. Okay.
THE COURT: Let's take our morning break.
(Recess taken.)
THE COURT: All right. You may proceed.
MR. MESEREAU: Thank you, Your Honor.
Q. Mr. Arvizo, do you recall being interviewed by the Santa Barbara Sheriffs about drinking in the arcade.
THE COURT: They can't hear you in the back of the room.
THE BAILIFF: Do you still have your microphone on.
MR. MESEREAU: It's on. 1937

1 Q. Mr. Arvizo, do you recall discussing with
2 the Santa Barbara Sheriffs your claim that you were
3 drinking in the arcade with Michael Jackson.
4 A. Yes.
5 Q. Do you recall telling them the following:
6 “We didn’t drink a lot”.
7 A. No.
8 Q. Would it refresh your recollection if I show
9 you a transcript from that interview.
10 A. Yes.
11 MR. MESEREAU: May I approach, Your Honor.
12 THE COURT: Yes.
13 MR. SNEDDON: I’m sorry, Counsel, what page
14 was that.
15 MR. MESEREAU: 26.
16 Q. Mr. Arvizo, have you had a chance to look at
17 that page.
18 A. Yes.
19 Q. Does it refresh your recollection about what
20 you told the Santa Barbara Sheriffs.
21 A. Not really.
22 Q. You told them, “We didn’t drink a lot,”
23 right.
24 A. I don’t know. It says it on there.
25 Q. Do you recall saying that.
26 A. No.
27 Q. Pardon me.
28 A. No. 1938

Q. Do you deny saying that.
A. I don't know if I ever said that.
Q. Would you agree that every time you were interviewed, your stories of drinking got worse and worse, correct.
A. No.
Q. You initially told them you didn't drink a lot.
A. That's true.
Q. Then you started telling them you drank a lot, and then you started telling them, "We drank every night," correct.
A. Well, "a lot" would be every night, so it would really --
Q. Pardon me.
A. "A lot" would be every night.
Q. And you're saying after Miami that you basically were drinking every single evening at Neverland, correct.
A. No, I told him that every single evening that Michael was there. In those transcripts, probably when -- I still -- I don't know.
Q. Isn't it true that every time you were interviewed, your stories of drinking got bigger and bigger and bigger.
A. No.
Q. Are you saying your stories to the sheriffs were always consistent when it came to drinking. 1939

A. I'm pretty sure they are. I mean, it
doesn't really matter whether I said that or not.
I'm saying the fact is that we drank every night
that Michael was there.
Q. Did you ever discuss your drinking with your
mother when she was at Neverland.
A. I think I called her up at night -- yeah, I
called her up at night once.
Q. You called her up.
A. Called her on Michael's phone.
Q. You called her from Michael's room to say
you were drinking.
A. No.
Q. During the nights after Miami, when your
mother was staying at Neverland, are you saying you
never discussed your drinking with her.
A. No. I -- there was one -- I'm talking about
the one night that I told Michael that -- I told
Michael about the test that I had to take, and I
called my mom up. That's what I was talking about.
Q. Okay. So not only did you never have a
discussion with your mother about where you were
staying at night, but you never had a discussion
with her about drinking alcohol; is that correct.
A. Yes.
MR. SNEDDON: Object as argumentative, Your
Honor.
THE COURT: Sustained. 1940

Q. BY MR. MESEREAU: When you were at the Calabasas Inn, was there a phone in your room.
A. I'm pretty sure there was.
Q. Did you ever see anybody call the police.
A. No.
Q. When you were shopping near the Calabasas Inn, to your knowledge, did anyone ever scream "help".
A. No, I don't think so.
Q. Ever see your mother do it.
A. No.
Q. Ever see Star do it.
A. No.
Q. Ever see your sister do it.
A. No.
Q. You didn't do it either, correct.
A. No.
Q. After you escaped from Neverland the first time, where did you go.
A. I think we went to my grandmother's house.
Q. To your knowledge, did anybody call the police and say, "We've been" --
A. No, because the thing was, like I --
Q. Let me just finish my question.
A. Okay.
Q. After you say you escaped from Neverland the first time, you went to your grandparents', correct.
A. Yes. 1941

1 Q. And how did you get there.
2 A. Jesus Salas drove us there.
3 Q. Do you recall anyone ever calling the police
4 and saying, “We’ve just been held against our will”.
5 A. No. Because like I -- my mom was --
6 Q. Let me just ask you the questions. Okay.
7 Nobody did, right.
8 A. No.
9 Q. A few days later, you went back to
10 Neverland, right.
11 A. I believe -- yes.
12 Q. And then you say you escaped a second time,
13 correct.
14 A. Yes.
15 Q. And when you escaped the second time, how
16 did you get out of Neverland.
17 A. I don’t know.
18 Q. Someone drove you somewhere, right.
19 A. Yeah, probably.
20 Q. Did you go to your grandparents’ again.
21 A. Probably.
22 Q. Nobody called the police from your
23 grandparents’ when you say you escaped the second
24 time, right.
25 A. No.
26 Q. And then you claim you returned, right.
27 A. Yes.
28 Q. And you say you finally escaped for good, 1942

1 right.
2 A. Yes.
3 Q. And when you got back after finally escaping
4 for good to your grandparents', nobody called the
5 police, correct.
6 A. No.
7 Q. Now, when you say Mr. Jackson masturbated
8 you, you've indicated that was sometime between
9 Jesus Salas driving your family to your
10 grandparents' and your final trip out of Neverland,
11 correct.
12 A. Yes.
13 Q. Okay. And that's at a time when you say
14 your mother was being threatened, correct.
15 A. My mother said that she felt -- that she was
16 being threatened, she felt. And Frank also told me
17 once that -- because he was angry about my mom
18 always wanting to leave and stuff.
19 Q. Okay.
20 A. And --
21 Q. But basically what you're saying is that the
22 inappropriate touching by Michael Jackson happened
23 after you'd escaped a few times, correct.
24 A. Yes.
25 Q. After you'd gone back a few times after your
26 escapes, right.
27 A. Yes.
28 Q. And after you claim you knew your mother was 1943

1 being threatened by Frank, correct.
2 A. Frank was angry at my mom once and he told
3 me, “Hey, Gavin, you know I could have your mother
4 killed.”
5 Q. Okay. And you believed him, correct.
6 A. Yes.
7 Q. Did you believe Frank.
8 A. Yes.
9 Q. All right. And you knew about the Brazil
10 planning at this point, correct.
11 A. Yes.
12 Q. Because you’d been to an agency, a federal
13 office to get a visa, right.
14 A. Yes.
15 Q. Do you remember driving down to that federal
16 office.
17 A. Yes.
18 Q. Do you remember going into the federal
19 office.
20 A. Yes.
21 Q. And while you were in that federal office,
22 nobody screamed for help, right.
23 A. No.
24 Q. And this was after you had the interview
25 with the three social workers at Jay Jackson’s home,
26 right.
27 A. Yes.
28 Q. And during the interview with the social 1944

workers at Jay Jackson's home, nobody screamed for help; true.
A. No.
Q. And that was after you went to Hamid's home for the rebuttal video, right.
A. I think it was. I don't know.
Q. Right.
A. I think it was.
Q. And what you're saying is that after your interview with the social workers, where you were asked questions about Michael Jackson, you're saying it was after that that inappropriate touching began, correct.
A. Yes.
Q. While Mr. Jackson is being investigated by Los Angeles County, true.
A. It -- it didn't happen until the last few weeks before I left. Or two weeks, somewhere around there.
Q. Let me ask the question again.
A. Okay.
Q. The three social workers were from Los Angeles County, true.
A. I think they were.
Q. And they were asking you questions about whether Mr. Jackson had ever inappropriately touched you, correct.
A. Yes. 1945

Q. And you said "No," right.
A. Yes.
Q. You knew they were investigating Mr. Jackson, right.
A. No, I thought they were just going to try to ask me, and that was it. I didn't know --
Q. But what you're telling the jury is that after this investigation starts and after you and your family are questioned, Mr. Jackson supposedly starts touching you inappropriately, right.
A. Yes.
Q. Okay. Now, you indicated to the jury last week that the first time Mr. Jackson inappropriately touched you, you weren't looking at him, right.
A. Well, it's like I would turn over to him sometimes. I glanced over at him a couple times.
Q. You said you weren't really looking at him, right.
A. Not really.
Q. Okay. You said you weren't looking at him, but you could somehow feel him moving, correct.
A. I could feel his leg like moving up against --
Q. Okay. After that, did you complain to your mother that you had been inappropriately touched.
A. No. I never discussed it with my mom. I never discussed it with my mom at all.
Q. Did you complain to Star that you had been 1946

inappropriately touched.
A. No.
Q. Did you complain to your sister that you had been inappropriately touched.
A. No.
Q. Did you complain to Jay Jackson that you had been inappropriately touched.
A. No.
Q. Were you upset when you say you were inappropriately touched.
A. If I was upset.
Q. Yes. Were you upset.
A. Yeah. Because, I mean, something happened to where, like, it's not like I can go back and change it; you know what I mean. It's like something that I have, like, no control of.
Q. Well, at this point, in your mind, your mother's been threatened and you've been inappropriately touched, correct.
A. Yes.
Q. And you remained at Neverland, true.
A. Yes.
Q. And you claim you continued to stay in his bedroom, right.
A. Well, I think he left after the second time.
Q. You think Michael Jackson left after the second time.
A. Yeah, a few days after the second time.

That's why I'm pretty sure that it happened a few --
two weeks before, because I know I'm pretty sure
that Michael left like a day after the second time.
Q. Well, but you told the jury last week it was
a couple of days before you left for good. Do you
remember that.
A. No. You kept on saying that.
Q. Pardon me.
A. No. You kept on saying that.
Q. Well, let's look at this.
You said that maybe a few days before you
left Neverland for good you were inappropriately
touched, right.
MR. SNEDDON: Judge, I'm going to object as
asked and answered. He was asked this morning.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you remember saying
last week, Mr. Arvizo, when I asked you when it
happened, you said, "No, it was more toward the end,
toward when we were already about to leave, after we
had been drinking alcohol and all that stuff. It
wasn't directly after the DCSF. It was more toward
the end of the" -- a few days before you left
Neverland, right.
MR. SNEDDON: Same objection, Your Honor.
Asked and answered.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You then changed it later 1948

1 on in that examination to say, “It was a week before
2 we left,” right.
3 MR. SNEDDON: Your Honor, I’m going to
4 object to counsel. He’s just trying to read this in
5 after the objection.
6 THE COURT: Sustained.
7 Counsel, you’re -- be quiet. You’re arguing
8 your case. Stop it. Start asking questions.
9 MR. MESEREAU: Yes, Your Honor.
10 Q. Do you know when you first saw Attorney
11 Larry Feldman.
12 A. Yes.
13 Q. When was that.
14 A. It was after all the stuff was done.
15 Q. And approximately when.
16 A. I don’t know.
17 Q. Have you discussed your meeting with Larry
18 Feldman with any prosecutor.
19 A. I don’t think so.
20 Q. At any time.
21 A. No.
22 Q. Pardon me.
23 A. No. I don’t think I ever talked to anyone.
24 Q. So you’ve never talked to any prosecutor
25 about your meeting with Attorney Feldman. Is that
26 what you’re saying.
27 A. I don’t think I did.
28 Q. Okay. Did you ever discuss your meeting 1949

with Attorney Larry Feldman with any sheriff.
A. I don't think I did.
Q. Do you know for sure.
A. No.
Q. You eventually spoke to a psychologist named Stanley Katz, correct.
A. Yes.
Q. Do you know about when that was.
A. No.
Q. You told Stanley Katz that chemotherapy had messed up your head. Do you remember that.
A. Yeah, it -- for a while it was hard for me to do schoolwork in school because of the chemotherapy.
Q. And you told Stanley Katz that, correct.
A. Yes.
Q. Did you tell him you had memory problems.
A. Yeah, for a while I had memory problems.
Q. And that was from chemotherapy, correct.
A. I believe so.
Q. Were you taking any medications at the time you returned to Neverland from Miami.
A. I had -- I have to take, even now, the 500 milligrams of Amoxicillin, and five milligrams of Lycinopril for my kidney and because I don't have a spleen.
Q. Do you remember telling Psychologist Stanley Katz you thought a crazy fan of Michael Jackson will 1950

kill you.
A. Yes.
Q. You never told that to the sheriffs,
correct.
A. I'm pretty sure I discussed it with them.
Q. Well, it never appears in your interviews,
right.
A. Yeah, I guess it didn't. But, I mean, it
doesn't mean I didn't tell them that.
Q. The only time that you used the word "kill"
was when you told the sheriffs that Frank had
threatened to kill your mom, right.
A. Uh-huh. In an interview.
Q. When did you start thinking that a crazy fan
of Michael Jackson will kill you.
A. When Frank kept on telling us that people --
there was death threats on us.
Q. What were the death threats.
A. I don't know. Frank just told us that.
Q. Well, when you discussed that with Stanley
Katz, you didn't tell him that came from Frank. You
told him you personally were frightened, right.
A. Yeah. Be -- but I mean --
Q. Is that right.
A. Yes. Frank was the one that really made me
realize that that could happen.
Q. Okay. Now, did you ever discuss with
Michael Jackson your fear that a fan might hurt you. 1951

A. I don't know.
Q. Did you ever discuss with Michael Jackson what Frank was telling you that you thought was threatening.
A. I don't think I did.
Q. Okay. So based on your experiences, Michael Jackson knew nothing about what Frank was saying to you, correct.
MR. SNEDDON: Object. It calls for speculation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: When you were at the Calabasas Inn, you never spoke to Michael Jackson, right.
A. No, I don't think so.
Q. The night before you did the rebuttal video, you never spoke to Michael Jackson, right.
A. I might have. I don't know.
Q. The day you did the rebuttal video, you never spoke to Michael Jackson, right.
A. No. Michael was telling me that I'm going to do a rebuttal for him.
THE REPORTER: What was the last part.
THE WITNESS: Michael was telling me before we went that we were going to do the rebuttal for him.
Q. BY MR. MESEREAU: Approximately when was that. 1952

A. Maybe right before the rebuttal.
Q. When you spoke on that rebuttal video, were you telling the truth.
A. No.
Q. Were you lying.
A. Dieter had us pretty much -- yeah, Dieter had us lie.
Q. Were you lying throughout that rebuttal video.
A. There was probably a few things that were true, but, I mean, a lot of it was what Dieter told us to say.
Q. Was it your understanding that your mother was lying.
A. She was saying what Dieter told her to say.
Q. Was it your understanding she was lying.
A. Yes, she was lying, because Dieter told her to say it.
Q. Was it your understanding that Star was lying in that rebuttal video.
A. Yes.
Q. And was it your understanding that your sister lied on that rebuttal video.
A. Yes.
Q. And you were lying about Mr. Jackson helping you with cancer; is that correct.
A. No, because Michael did help me a little bit, but, I mean, he -- for me, what I felt as a 1953

1 little kid, I mean, besides the fact of all this
2 money and who paid for this and who paid for that,
3 who -- I felt who really helped me was my other
4 friends.
5 Because Michael, at the time when he was
6 calling me and talking to me and stuff, I felt like
7 he was my best friend. But, I mean, when he -- when
8 I would call his phone numbers and a little
9 operating lady would say, "This phone is no longer
10 in service." I mean, I never called Chris and his
11 phone was never in service. I never called George
12 and his phone wasn't in service.
13 Q. Do you recall being caught at Neverland with
14 girlie magazines when you were not around Michael
15 Jackson.
16 A. No.
17 Q. Are you saying that never happened.
18 MR. SNEDDON: Your Honor, 403 hearing.
19 THE COURT: Sustained.
20 I'll -- that's sort of a -- you know what
21 he's talking about on the 403 hearing, right.
22 MR. MESEREAU: I thought I was able to get
23 into these areas on cross.
24 THE COURT: Yes. That's why I'm looking at
25 you, because I don't want to discuss it. I just
26 want to make sure we understand each other.
27 MR. MESEREAU: Yeah, I won't go further than
28 that on this one. 1954

There's another area, too, I think the Court gave me permission.
THE COURT: That's correct.
Q. BY MR. MESEREAU: Mr. Arvizo, you were caught masturbating at Neverland when Michael Jackson wasn't even around, weren't you.
A. No.
Q. You were caught masturbating in a guest quarters, weren't you.
A. No.
Q. No one ever saw you do that.
A. No.
Q. No one ever talked to you about that.
A. No one ever talked to me about it.
Q. Okay. Long after you did the rebuttal video, you had written numerous letters and cards to Michael Jackson thanking him for what he did for your cancer, true.
A. Yes.
Q. Long before you did the rebuttal video, you had written numerous cards and letters to Michael Jackson referring to him as your father, true.
A. Yes. Because I missed him. I mean, I wanted to know what happened, why he wasn't calling anymore. And that's the only real way I had connection with him was through mail, because I had Evvy's -- I knew where Evvy was, so I could send it to her. 1955

Q. And long before you did the rebuttal video, you sent cards and letters to Michael Jackson referring to yourself as his son, true.
MR. SNEDDON: Your Honor, I'm going to object. This has all been asked and answered.
MR. MESEREAU: I don't think it has.
THE COURT: Well, there wasn't a time frame. You have covered the cards and letters. Is there a specific time frame you're concerned about.
MR. MESEREAU: Any time before the rebuttal video, Your Honor.
THE COURT: I think you've covered that. The objection is sustained.
MR. MESEREAU: Okay. Okay.
Q. We're going to go through the rebuttal video. And I'm just going to ask you some questions about what you said and how you said it. Okay.
A. Okay.
MR. MESEREAU: All right. Your Honor, at this time we'd like to play the rebuttal video.
THE COURT: What is that. "Input 4".
MR. SANGER: Yes. Your Honor, for the record, it's Exhibit 340.
THE COURT: Exhibit 340.
Ready.
I'd like one of those whistles just before I make a ruling.
MR. SANGER: Tell me to queue it up, Your 1956

Honor.
Just for the record, I turned the sound off on this so we wouldn't....
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Now, you heard what your mother just said, right.
A. Yes.
Q. And is it your belief your mother is lying.
A. Um, right there, not really, because I had a pretty good relationship with him, you know, right at the beginning.
Q. So you don't think your mother is lying when she makes that statement, correct.
A. Well, not really, because, I mean, he was like really close to me in the beginning. I mean, I guess, I thought I was close to him; you know what I mean.
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Mr. Arvizo, when you made those statements, were you lying.
A. Statements about the first night.
Q. What you just said, yes.
A. The sleeping arrangements. 1957

Q. Yes.
A. No, I wasn't lying about that.
Q. Have you told any lies so far in this rebuttal tape.
A. I don't -- I remember I said something that -- oh, yeah, because Michael told me in the office, in his office, to ask my parents if I could sleep in his room. So it wasn't -- he told me to ask in front of my parents.
Q. So are you saying this is a lie you just told.
A. I'm just saying that -- about how I asked my parents.
Q. Yes.
A. That's a lie.
Q. That's a lie.
A. Yes.
Q. Okay. Is that the first lie you've told in this rebuttal tape, as far as you can see.
A. Yes.
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Mr. Arvizo, you heard what you just said. Is that a lie.
A. No.
Q. Was everything you said there truthful. 1958

A. Yes.
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Mr. Arvizo, you've heard what your mother just said. Was it your belief that she was lying.
A. There's a part in there, like, that there was no way to cure me. Dieter told us to say that.
Q. Okay. So that was not true.
A. Yeah, because they did do radiation and chemotherapy.
Q. The truth was, you had needed radiation and chemo to cure you, and what your mother said was a lie, correct.
A. About there was no way to cure me, that Michael was the only person that could cure me.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Mr. Arvizo, is what you said there the truth.
A. Yes.
Q. Have you told any lies in this particular segment.
A. No.
Q. Okay. 1959

(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Gavin, is your mother telling the truth.
A. Yes, because I remember -- I think Michael did, like, a blood drive or something. Yeah, a lot of my other friends were also helping, thank God, because, I mean, it's such a rare blood that I needed.
Q. But is your mother telling the truth in the statements she makes.
A. Yes. About Michael, yes.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Gavin, is your sister telling the truth when she makes that statement.
A. Not really, because she was saying that -- well, she was saying that people were always turning us away. And that's not true, because, I mean, Jamie Masada was helping us, Louise Palanker was helping us, George Lopez was helping us. I'm pretty sure -- I'm not too sure, but I'm pretty sure Dieter told her to say that also, that no one else was helping us but Michael.
Q. And Chris Tucker was helping you, correct.
A. Yes, Chris Tucker was helping us, yes. 1960

Q. Okay. And this is the rebuttal video that you did before the meeting with the three social workers, correct.
A. I don't know. I'm pretty sure I did it before the social workers.
Q. You went the next morning to interview with the social workers, didn't you.
A. I think I did.
Q. Okay. Let me ask you a question: You said repeatedly in this trial that Mr. Jackson did not inappropriately touch you until after this video was done, correct.
A. Yes.
Q. And repeatedly in this video, you make statements about what a wonderful person Mr. Jackson is, right.
A. Yes.
Q. Do you remember telling Mr. Sneddon and the sheriffs on one occasion that you were molested before the video was done.
A. No.
Q. Would it refresh your recollection if I show you a transcript of that interview.
A. Yes. Please.
MR. MESEREAU: May I approach, Your Honor.
THE COURT: Yes.
Q. BY MR. MESEREAU: Have you had a chance to look at that transcript. 1961

A. Yes.
Q. Does it refresh your recollection that Mr. Sneddon was interviewing you about when these acts of molestation allegedly occurred.
A. Yes. But the thing was, I don't -- even to this day, I don't remember exactly when everything happened exactly, so I mean --
Q. Well, do you remember being asked, "The acts of molestation, had they already begun by the time you did this video, do you know." And you said, "I think so."
And then Mr. Sneddon said to you, "So, in your mind, one of the things that you're thinking is, they're doing this video that they want you guys to do so that if you ever told them the truth about being molested, nobody would believe you," and you say, "Yeah," right.
A. Well, I --
Q. Do you remember saying that to Mr. Sneddon.
A. That's more of my opinion - you know what I mean. - right there. That last statement you just said on that transcript, it's more of my opinion than a state of fact.
Q. Well, Mr. Sneddon asked you last week when this inappropriate touching supposedly occurred, and you said it was after the rebuttal video was made, correct.
A. Yes. 1962

1 Q. But in an interview with Mr. Sneddon before
2 this trial ever began, you told him differently,
3 correct.
4 A. That's what it says right there. But it
5 happened after.
6 Q. Did someone ever say to you, "You have to
7 say it happened after, because on the rebuttal video
8 you deny he's ever done anything wrong".
9 A. No. No one's ever told me that.
10 Q. Then why does your story change.
11 A. I don't know. It happened after. I mean --
12 Q. Well, at some point did you go to Mr.
13 Sneddon and say, "I'm changing my story about when
14 this inappropriate touching happened".
15 A. No.
16 Q. At some point did you go to the sheriffs and
17 say, "I'm changing my story about when this
18 inappropriate touching happened".
19 A. No.
20 Q. You just suddenly got on the stand and
21 changed it.
22 MR. SNEDDON: Object as argumentative, Your
23 Honor.
24 THE COURT: Sustained.
25 Q. BY MR. MESEREAU: Have you ever had any
26 discussion at any time with Mr. Sneddon where you
27 used words to the effect, "I'm changing my story
28 about the time this molestation happened". 1963

A. No.
Q. Okay. When Mr. Sneddon asked you questions last week about when this molestation supposedly occurred, was that the first time you said to Mr. Sneddon it happened after the rebuttal video.
A. I don't think so.
Q. You don't think so.
A. I don't think that was the first time I ever told him that it happened after the rebuttal video.
Q. So are you saying that at different times you gave Mr. Sneddon different accounts of when the molestation supposedly happened.
MR. SNEDDON: Your Honor, I'm going to object to that question. Assumes facts not in evidence, and it's argumentative and speculative.
THE COURT: Overruled.
Do you want the question read back.
THE WITNESS: Yes.
(Record read.)
THE WITNESS: Sometimes I would talk to Mr. Sneddon without having like an interview -- or, like, have a recorder or something. And I would talk -- like, Mr. Sneddon was being really nice to me. Like he was helping me, and he was making me feel better about what happened and stuff. So he's been really nice to me.
Q. BY MR. MESEREAU: Do you remember telling the Santa Barbara Grand Jury that after the Miami 1964

trip, your brother stayed in Michael's room with you every night until the last few days.
A. Yeah, he stood in my room -- he stood in the room with me and Michael pretty much every day. Some days he wouldn't stay there.
Q. Do you remember telling the grand jury that until the last few days, your brother Star stayed with you in Michael's room all the time.
A. He stood with us -- well, he -- the last -- the last week or two, or a few days, or something like that, he didn't. Well, because my brother wasn't there when it happened, so I'm pretty sure it wasn't -- he stopped staying there the last few weeks.
Q. Do you remember telling the Santa Barbara Grand Jury:
"Q. Was your brother staying in the room with you during that time.
"A. Well, the last few times he didn't, but he was, like, when Michael was there -- when Michael was there --
"Q. Uh-huh.
"A. -- he stood with me for all the time when Michael was there. But, like, toward the end, toward the last few days, he wasn't staying with me no more."
Do you remember that.
A. Uh-huh. 1965

Q. And you've also told this jury that the two times you claim Michael Jackson inappropriately touched you Star wasn't there, correct.
A. Yes.
MR. MESEREAU: We can continue.
MR. SANGER: Are you ready. Your Honor, we need the....
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Do you think your sister is lying when she made those statements.
A. No. Because, I mean, people on the news media were -- might have been saying something, probably. I don't know.
Q. So you think she's telling the truth when she says what she just said.
A. Probably. I mean, I looked at her, and she's crying and stuff, so....
MR. MESEREAU: Okay. Go ahead.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Is what your mother just said correct.
A. No. Because we could have at any time stood at my grandmother's house. I mean, it's not like --
Q. In your opinion, was your mother lying when 1966

she made that statement.
A. I remember hearing Dieter talk to her, so I'm pretty sure Dieter told her to say that.
Q. Well, that --
A. We can stay at my grandmother's house. We could stay at one of our family members' house; you know what I mean. It's not like we were spit on and all this other stuff; you know what I mean.
Q. My question to you is, did your mother just lie, in your opinion.
A. She's saying what Dieter told her to say.
Q. Did she lie. Yes or no.
A. She -- well, only because --
MR. SNEDDON: Argumentative, Your Honor.
THE COURT: Overruled.
You may answer.
THE WITNESS: Yes.
MR. MESEREAU: Okay. Go ahead.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: You just heard your sister's statement; is that true.
A. A little bit of it is true.
Q. Did she lie in part of that.
A. I mean, because we would talk about girls at times, and -- like all my friends that were females and stuff like that. But I mean -- 1967

Q. You would talk with Michael Jackson about your female friends.
A. Yeah. He would talk to me about girls and how to, like, handle them; you know what I mean. Like how to talk to a girl or something like that.
Q. So that statement's true.
A. Yes.
Q. And anything else you just heard that's not true.
A. No, not really. No.
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Was the statement you just made true.
A. No. Because I didn't really have a phone number to call him.
Q. So were you lying.
A. Yes.
Q. Okay. Was your mother lying also.
A. No, not really.
Q. Was she telling the truth.
A. Pretty much, yeah.
Q. After the Miami trip, were you able to call Michael Jackson.
A. Michael would -- I was at Neverland.
Q. Were you able to call him after the Miami 1968

1 trip.
2 A. I would talk to him when he was at
3 Neverland. I mean, I didn't really call him.
4 Q. Did you ever call him at Neverland on any
5 phone.
6 A. I don't know. I don't think I did.
7 Q. You don't remember.
8 A. I don't remember.
9 Q. Well, there were phones you could use to try
10 to call Michael Jackson when you were at Neverland,
11 correct.
12 A. Yes.
13 Q. Where were the phones.
14 A. All over the house and stuff.
15 Q. You tried to call him often, didn't you.
16 A. Well, why would I try to call him if I could
17 just go and talk to him at Neverland.
18 Q. Well, it's a large ranch, correct.
19 A. Yes.
20 Q. You used to spend time in the theater,
21 correct.
22 A. Yes.
23 Q. Did you ever try and call Michael Jackson
24 from the phone in the theater.
25 A. No. Because I would just go over in my
26 little cart to see Michael.
27 Q. Did you ever try to call Michael Jackson
28 from the guest quarters. 1969

A. No, because I had the code to his room and I would go up there when he -- when he was there.
Q. Ever try calling him from the amusement area.
A. No. There's not really any phones out there.
Q. Ever try calling him from the zoo area.
A. No.
Q. When you made this rebuttal video, you could get in contact with him almost any time, couldn't you.
A. I could drive over to where he was in my cart at Neverland, but never had a phone number if he left or something.
MR. MESEREAU: Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Is what your brother Star just said true.
A. Yeah, Michael let us call him --
Q. Pardon me.
A. Yes, Michael let us call him "Daddy Michael."
Q. So what he said was correct.
A. Yes.
MR. MESEREAU: Okay.
(Whereupon, a portion of a DVD, People's 1970

1 Exhibit 340, Disk 1, was played for the Court and
2 jury.)
3 Q. BY MR. MESEREAU: Was the statement you just
4 made the truth.
5 A. Yeah. Yes.
6 Q. Is what your mother just said the truth.
7 A. I guess. I mean, I don't know if Michael
8 was trying to teach us that or --
9 A VOICE FROM THE AUDIENCE: We can't hear.
10 THE WITNESS: I don't know if Michael was
11 trying to teach us that or something.
12 Q. BY MR. MESEREAU: Well, did your mother tell
13 the truth, in your opinion.
14 A. Yes.
15 Q. Did you tell the truth, in your opinion.
16 A. Yeah, we'd go on rides and watch movies.
17 Q. How about the other things you said, are
18 they true.
19 A. Yes.
20 (Whereupon, a portion of a DVD, People's
21 Exhibit 340, Disk 1, was played for the Court and
22 jury.)
23 Q. BY MR. MESEREAU: Is what your mother just
24 said the truth.
25 A. I kind of stopped paying attention for a
26 while.
27 Q. Excuse me. Huh.
28 A. I started looking at the roof and stuff. I 1971

wasn't really paying attention.
MR. MESEREAU: Can we replay that, Your Honor.
MR. SNEDDON: Well, Judge, it would call for speculation on his part anyhow.
MR. MESEREAU: I'm asking for his opinion.
THE COURT: I guess you'll have to.
MR. MESEREAU: Okay.
THE COURT: Can you do it without --
MR. MESEREAU: This may take a while, Your Honor.
I think we'll just go forward, Your Honor.
THE COURT: Do you want to just go forward.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: In your opinion, is your mother telling the truth.
A. Yes, we felt as if he was closest to us as a father and family.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Were you telling the truth when you made that statement.
A. What I just said right now.
Q. Yes.
A. Well, I didn't pray to meet Michael Jackson 1972

1 when I was little.
2 Q. Did you pray to meet Michael Jackson at any
3 time.
4 A. No.
5 Q. You made a statement about Michael Jackson's
6 charitable acts. Did you hear that.
7 A. Yeah. I knew he donated to charities. I
8 knew about that.
9 Q. Was the statement you made true.
10 A. Yes.
11 Q. You just heard your mother make some
12 comments.
13 A. Um --
14 Q. In your opinion, were they true comments.
15 A. I don't really remember what she just said.
16 I'm sorry. I just --
17 Q. Well, your mother praises Michael Jackson
18 throughout this video, true.
19 A. Yes.
20 Q. Is she telling the truth.
21 A. Some parts she is; some parts she isn't.
22 Depends on what she's praising him about.
23 Q. Did you and your mother discuss that you
24 were going to lie before you did this video.
25 A. No. Dieter discussed it with us.
26 Q. Did you discuss that you were going to tell
27 lies with your mother at any time before this video.
28 A. No. Dieter discussed it with us. 1973

Q. Did you discuss with your brother or sister at any time that you were going to lie in this video.
A. No.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: In your opinion, did Michael ever claim you and your brother and sister as his kids.
A. Well, he would call me "son" if -- depends what she was trying to say, but -- I don't know.
Q. In your opinion, did Michael Jackson ever claim that you, your brother and sister were his kids.
A. What do you mean by "claim". Like claim on T.V., or claim on his taxes, or --
Q. You don't know what I'm asking you.
A. Well, he said -- as I said, he called us -- he said that, like, if he would call me "son" sometimes - you know what I mean. - if that's what she's trying to say.
Q. Did you ever think you were part of Michael Jackson's family.
A. I felt as if I was his family.
Q. In your opinion, did your mother think she was part of Michael Jackson's family at one point.
A. What did my mom believe. 1974

Q. No, in your opinion, did your mother think she was part of Michael Jackson's family at one point.
A. Um, I don't know. That's what she believes.
Q. Do you know whether she felt that way or not.
A. No. I don't know whether she --
Q. In your opinion, did either your brother or your sister ever think they were part of Michael Jackson's family.
A. I know my brother did, because my brother was sad by my biological father leaving, as I was. And he felt that, as I did, about Michael being close to us as if he was a father because we didn't have one.
Q. You were looking for a family, correct.
A. I wasn't really, like, going out and looking; you know what I mean. I was just -- came across as Michael being the only older male that was close to me in my life; you know what I mean.
Q. And you wanted to be part of the Jackson family, correct.
A. Not really Jackson family. But just Michael was there and he was like a father figure to me; you know what I mean.
Q. You think of Paris and Prince as your brother and sister.
A. Yeah, we would talk about it and stuff. I 1975

would always play with them, and I would teach them stuff, and we would go look at stuff together and stuff like that.
Q. And in your opinion, did Star and your sister think of Paris and Prince as their brother and sister.
A. I don't know.
Q. But you did, right.
A. Yes.
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Is what you just said the truth.
A. What I had said.
Q. Yes.
A. Yes.
Q. Is what your mom just said the truth.
A. Which -- I can't -- she said what she said.
Q. Did you think of Michael Jackson, when you made this video, as honest.
A. Not really, because he said that I can call him at any time, and I didn't really have the phone numbers before that.
Q. So because of that, you thought he was dishonest.
A. Yes. 1976

Q. Did you think of Michael Jackson as loving when you made this video.
A. Yes.
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: In your opinion, is what your mother just said the truth.
A. Yes. He seemed very loving and we trusted him a lot.
Q. So in your opinion, your mother meant what she just said.
A. Yes.
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Is what you just said the truth.
A. Yeah, Michael invited me to Neverland.
Q. That's not what I asked you. Is what you just said the truth.
A. Yes. Well -- well, it would be the truth, because in the beginning of my cancer he would invite me to Neverland after, to come after my chemotherapy round.
Q. When you made these statements, was Michael 1977

1 the kind of person you were describing, as far as
2 you were concerned.
3 A. Yes, he was very nice to me and stuff.
4 Q. And he was nice to your family.
5 A. Yes. It was what was in my eyes.
6 Q. Excuse me.
7 A. What I saw, in my eyes.
8 (Whereupon, a portion of a DVD, People's
9 Exhibit 340, Disk 1, was played for the Court and
10 jury.)
11 Q. BY MR. MESEREAU: Was what you have just
12 said the truth.
13 A. Yes. Pac Man; Michael did tell me to say
14 that.
15 Q. What about everything else you said.
16 A. About me going to chemotherapy.
17 Q. Yes.
18 A. No. I wouldn't think about it every time I
19 went to a chemotherapy round.
20 Q. So were you lying at that point.
21 A. Yeah, Dieter actually told me to say that,
22 because he knew about the Pac Man.
23 Q. When I say whether you lied, I'm not asking
24 what Dieter said. I'm just asking what you, Gavin
25 Arvizo, said, all right. Did you just lie on that
26 tape.
27 MR. SNEDDON: Your Honor, I'm going to
28 object. He doesn't even let him answer the 1978

question.
THE COURT: Yes, but it's not necessary to give a pre-statement to your question.
MR. MESEREAU: Yes, Your Honor.
THE COURT: Go ahead and rephrase it.
Q. BY MR. MESEREAU: When you just made the statement that everybody heard in this courtroom, did you lie.
A. About the Pac Man thing, me going in every single time in chemotherapy.
Q. Yes.
A. Yes.
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 1, was played for the Court and jury.)
Q. BY MR. MESEREAU: Is what your mother just said about you wanting to be in movies true.
A. Yes. Michael was saying that he was going do some movie, or something, about some orphanage.
Q. What about you wanting to be in movies.
A. Oh, yes, I wanted to be an actor for a while. But now I want to -- hopefully I can -- I want -- well, I don't really want to say, but I want to do something else.
Q. Let me ask you what you just said. Did you say you want to be in movies.
A. I wanted to. But now that I'm in high 1979

1 school and I'm seeing all the other careers, I want
2 to do -- I want to be in law enforcement, or
3 whatever.
4 Q. At the time you were going to Neverland, did
5 you want to be in movies.
6 A. Yes.
7 Q. Did you tell Michael Jackson you wanted to
8 be in movies.
9 A. Yes.
10 Q. To your knowledge, did your brother Star say
11 he wanted to be in movies.
12 A. I'm pretty sure he wanted to.
13 Q. Is there anything you just heard your mother
14 say that you think is not true.
15 A. No. I don't think -- I think everything she
16 said was true.
17 Q. Okay.
18 MR. SANGER: Putting in Disk 2, Your Honor.
19 (Whereupon, a portion of a DVD, People's
20 Exhibit 340, Disk 2, was played for the Court and
21 jury.)
22 Q. BY MR. MESEREAU: Is everything you just
23 said correct.
24 A. I don't -- I don't think I said anything
25 right there.
26 Q. Well, you said -- you've seen the first disk
27 of this rebuttal video, correct.
28 A. Yes. 1980

Q. How many lies do you think you told.
A. Um, I think maybe about four.
Q. Four lies.
A. Yeah.
Q. How many lies do you think your mother told.
A. Four or five. I'm not -- I mean --
Q. Four or five lies.
A. I wasn't counting or anything.
Q. I'm just asking what your opinion is. How many lies do you think your sister told.
A. One or two.
Q. And how many lies do you think Star told.
A. Oh, he wasn't really talking, so I don't think he really said anything.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
Q. BY MR. MESEREAU: Now, you heard what your mother just said, right.
A. Yes.
Q. You saw the way she expressed herself, correct. Do you think she's just doing what Dieter wants.
A. No, not right there.
Q. Do you think she's doing what she wants.
A. Yes.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and 1981

jury.)
Q. BY MR. MESEREAU: You just said you didn't like Martin Bashir, was that true.
A. Uh-huh. Yeah, because when it came out on the CNN and stuff, then I saw it, I saw parts of it. I mean, what part I know Bashir was saying, that at the time I didn't feel was true.
Q. You didn't like him personally.
A. Not really. I mean --
Q. When did you decide you didn't like Martin Bashir.
A. After I found out that he -- that it was an actual documentary and what he was saying about Michael.
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
Q. BY MR. MESEREAU: Now, your mother mentions gang signs. Do you know what she's talking about.
A. She was probably joking about something.
Q. Do you know what she was joking about.
A. Not really.
Q. She talks about friends on the west side. Do you know what that's all about.
A. It was just a joke, about like -- because you know how gangs say "east side" or "west side" or something. 1982

Q. But you're really not sure what she was talking about, right.
A. Are you trying to say my mom's in a gang or something.
Q. No, I'm asking you a question. Do you know what she was referring to.
A. She was making a joke.
Q. Okay. And what was the joke about, in your opinion.
A. About gangs. Pretty much making fun of gangs.
Q. Okay. And were you joining with her in making fun of gangs.
A. I was laughing, I guess, right there.
Q. Okay. Did you do a gang sign.
A. No. She probably -- I was probably pointing or something, and then -- I don't know. I'm not a part of a gang. I'm not a part of a crew or something.
Q. I'm asking you if you made a gang sign in this video.
A. No.
Q. Do you know what your mother was referring to.
A. No. She was probably just joking about something that they were talking about off camera.
Q. Okay. But you don't know for sure, right.
A. No. 1983

Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
Q. BY MR. MESEREAU: Is your mother telling the truth.
A. Dieter told her to talk about the hands thing.
Q. I'm asking if your mother is telling the truth. I'm not asking about Dieter.
A. She talked about her opinions, so I don't know if that's her -- if she was really telling the truth or not.
Q. Did someone tell you whenever I ask a question like this, to refer to Dieter.
A. No. I'm referring to Dieter because Dieter's the one that told us to say all these things.
Q. Did your mother just tell the truth, in your opinion.
A. Um, I don't know, because that's her opinion.
Q. In your opinion, Gavin Arvizo, did your mother just tell the truth.
A. I do not know, because that's -- you can call my mother and ask her that, because I don't know.
THE COURT: All right. Let's take our break. 1984

(Recess taken.)
THE COURT: Go ahead.
MR. MESEREAU: With your permission, Your Honor, we'll just continue the tape.
THE COURT: All right.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
Q. BY MR. MESEREAU: Gavin, is your mother, in your opinion, telling the truth.
A. I think so, I guess.
Q. Excuse me.
A. I believe so, I guess.
Q. I couldn't hear what you said.
A. I believe so, I guess.
Q. Okay. Have you heard her say anything at this point that's not true.
A. I mean, Michael was nice to me and stuff, and I felt as if he was like a father to me, so --
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
Q. BY MR. MESEREAU: At some point you and your mother and your brother and your sister concluded that Michael Jackson didn't want you all to be part of his family, right.
A. Yes. 1985

Q. And you were upset about that, correct.
A. We concluded because --
Q. Just answer my question, if you would, please. Okay.
A. Okay.
Q. At some point you, your mother, your sister and your brother realized that you were not going to spend the rest of your lives as part of Michael Jackson's family, correct.
A. Well --
Q. Is that true or not.
A. It's like we didn't really conclude all together, "Hey, everybody." I mean, I guess we all realized on our own that, like -- that he isn't as nice of a man as we thought he was.
Q. Because he wasn't going to let you be part of the Michael Jackson family, correct.
A. We never wanted to be part of the Michael Jackson family. The only part of it was, he was just like a father to me.
Q. Yes.
A. That's the only part in connection to a family there would be. We weren't expecting a -- to live with him forever. We were expecting -- well, we just thought of him -- I thought of him as a father figure.
Q. You expected Michael Jackson to support you, your mother, your brother and your sister 1986

indefinitely, correct.
A. No.
Q. You wanted to be part of his family, and when you found out you weren't going to be, you got angry, true.
A. No.
Q. You found out --
A. I -- I didn't -- I never thought we were going to be, "Okay, he's going to be our dad. We're going to live in the house together," and blah, blah, blah. No.
He -- I saw him as like someone who could guide me as a father would; someone who can talk to me and stuff like that. I mean, it would be stupid if you wanted to live with a man like that for the rest of your life. He's not really my father.
Q. Would you agree that your mother got very angry in front of you when she realized Michael Jackson was fading out of your lives.
A. No.
Q. Would you agree that you got very angry when, at some point, you realized Michael Jackson was fading out of your family's life, right.
A. I didn't really get angry. I mean, it's -- I mean, I didn't think he was going to live with us forever. I just -- like, you know the Big Brother program thing for, like, kids that don't have dads. That's kind of what I thought of Michael as. 1987

Q. You expected Michael Jackson to keep helping you, your mother, your brother and your sister, right.
A. I didn't expect it from him, no.
Q. And that's why you got very angry when you realized certain people wanted you to leave the country, right.
A. Michael told me that he was going to come over later after we were there, so -- after we even got there.
Q. And were you looking forward to meeting Michael in Brazil.
A. Yes. I guess.
Q. And at some time did you realize that Michael wasn't going to Brazil.
A. No, to my understanding was that he was always going to come a week later after we got there.
Q. But at some point you realized even you weren't going to Brazil, right.
A. No, I thought the whole time they were trying to get us to go to Brazil.
Q. And when you wanted to go to your grandparents', you all got into a car and Vinnie drove you to your grandparents', right.
A. After -- yeah. Vinnie drove us there, yes.
Q. And at that point you realized you're never going to be in Michael Jackson's family, right. 1988

A. Well -- I never wanted to be in his family.
I was never looking for that.
MR. MESEREAU: Let's keep going.
(Whereupon, a portion of a DVD, People's
Exhibit 340, Disk 2, was played for the Court and
jury.)
Q. BY MR. MESEREAU: Now, your brother Star had
just said that going to Neverland Ranch was
something you always looked forward to, right.
A. Yes.
Q. And at one point you realized you probably
weren't going to be returning to Neverland Ranch,
right.
A. After it was all over, I didn't want to go
back.
Q. At some point you realized you weren't going
to be in Michael Jackson's family, you weren't going
to Neverland Ranch, and it wasn't until then that
you ever came up with these allegations of
molestation, right.
A. I didn't want to go back after I came back.
Q. Please answer my question.
It wasn't until you realized that you and
your mother and your brother and your sister were
not going to be part of Michael Jackson's family
that you ever told anybody about any molestation,
right.
A. It wasn't as if we got together and realized 1989

it. It wasn't -- so your question isn't really working.
MR. MESEREAU: Your Honor, could I request that the witness be instructed to answer the question.
THE WITNESS: I don't really understand the question.
THE COURT: All right. Go ahead. Rephrase your question.
Q. BY MR. MESEREAU: Okay. It wasn't until you realized you were not going to be part of Michael Jackson's family, you were not going to meet Michael Jackson in Brazil, you were not going to be going to Neverland, that you ever came up with these allegations of molestation, right.
A. I didn't come and talk to the -- to the -- my mom always wanted to leave. She was the one that was able to realize and get us out of there. I liked being there.
MR. MESEREAU: Excuse me. Your Honor, can I ask the witness be instructed to just answer the question.
THE COURT: No.
THE WITNESS: I don't understand --
THE COURT: Just a minute. No. Your question is compound and it's argumentative. Break your question down.
MR. MESEREAU: Okay. I will, Your Honor. 1990

Q. Until you realized you were not going to be part of Michael Jackson's family, you never made any allegation of child molestation, correct.
A. I didn't want to be part of his family. I just saw him as a father figure.
Q. Until you realized Michael Jackson was not going to meet you in Brazil, you never made any allegation of child molestation, right.
A. I didn't even really want to go to Brazil.
Q. Until you left Neverland for the last time, you never made any allegation of child molestation, correct.
A. I didn't tell anyone until I left for the last time, correct.
Q. And never called the police until after you'd seen two lawyers, right.
MR. SNEDDON: Object as argumentative, Your Honor.
THE COURT: Overruled.
THE WITNESS: Yes, it wasn't until I saw two lawyers until I told the police what really happened.
MR. MESEREAU: Okay. We can keep going.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
Q. BY MR. MESEREAU: Did you, your mother, your brother, your sister actually have to share cereal 1991

1 when you were too poor to get other food.
2 A. I know we had problems with trying to get
3 food and stuff, but I don't know if we shared a box
4 of cereal.
5 Q. Okay.
6 A. And --
7 (Whereupon, a portion of a DVD, People's
8 Exhibit 340, Disk 2, was played for the Court and
9 jury.)
10 Q. BY MR. MESEREAU: At this point in time, did
11 you agree with what your mother just said. Did you
12 think Michael was there for you.
13 A. Yeah, I believe -- I thought that Michael
14 was there for us. But he -- he helped us.
15 (Whereupon, a portion of a DVD, People's
16 Exhibit 340, Disk 2, was played for the Court and
17 jury.)
18 Q. BY MR. MESEREAU: Now, you and your family
19 did pray with Michael, correct.
20 A. Yes. I believe we asked him if we can pray
21 at the dinner tables.
22 Q. You also one time were in the theater; you,
23 your mother, your brother and your sister and
24 Michael. Remember that.
25 A. We were in the theater a lot together.
26 Q. Do you remember your mother wanted everyone
27 to hold hands and pray with Daddy Michael.
28 A. No. 1992

Q. You don't remember that at all.
A. No.
Q. Okay. Did you typically pray at the dinner table with Michael.
A. We would ask him sometimes.
Q. You asked him and he said, "Okay".
A. Yes.
Q. And what prayers did you say.
A. "Thank God for the food we were going to eat," and stuff like that.
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
Q. BY MR. MESEREAU: In your opinion, is your mother telling the truth about that statement.
A. About the relationship between me and Michael.
Q. About what you just heard.
A. Yeah, I was pretty close to Michael, as I've said many times.
Q. So do you have any -- excuse me, let me rephrase that.
What your mother just says is true, as far as you're concerned.
A. Yeah. Up to that point, yes.
Q. Are you saying "yes".
A. Yes. 1993

(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)

Q. BY MR. MESEREAU: When these statements were made, you did not want your relationship with Mr. Jackson to end, correct.

A. No, I still wanted to be able to call him and stuff like that.

Q. And among all the celebrities that you had met, no celebrity had included you in their family the way Michael Jackson had, right.

A. He didn't really include me in his family. I just -- as I said before, I looked to him as a father figure, and he looked at me as a son, because he was the only father figure I had.

Q. And your letters to him reflected that, correct.

A. Yes.

Q. Your calls to him reflected that, correct.

A. Yes.

Q. When you went to the ranch, you felt you were part of a family, correct.

A. As I just told you, I felt as if he was my guider, my -- a teacher to me in life. A father figure to me.

Q. And when you left Neverland for the last time, you felt your father had rejected you, correct. 1994

A. Not really, because I found a new father.
I found my now father.
Q. When you left Neverland, did you feel that
the father figure Michael Jackson had rejected you;
yes or no.
A. I didn't need him. I didn't want him.
Q. When you left Neverland for the last time,
did you feel that the father figure Michael Jackson
had rejected you; yes or no.
A. As I said, I didn't feel that. I didn't
feel that I was rejected, because I had my now,
which I consider my real father.
Q. You knew Jay Jackson long before these
statements were made, correct.
A. Yes.
Q. You knew Jay Jackson long before you were
referring to Michael Jackson as a father figure,
correct.
A. Not long before, but, I mean, he was my
mom's boyfriend. I didn't know him. I wasn't close
to him.
But when I came back, I saw his concern.
I saw the way he felt about my family and how he
would hug me, and actually feel like he's a man; you
know what I mean. And he's my father.
Q. At the time you and your mother and your
brother and your sister made the statements on this
video, your mother had been in a relationship with 1995

1 Jay Jackson for many months, true.
2 A. Yes.
3 Q. At the time your mother makes these
4 statements that Michael Jackson is a father figure,
5 she's in a relationship with Jay Jackson, right.
6 A. Yes.
7 Q. Jay Jackson wasn't present when this video
8 was done, correct.
9 A. No.
10 Q. Now, at some point did you learn that the
11 actual rebuttal show went on television.
12 A. This.
13 Q. Yes.
14 A. I never knew it went on television.
15 Q. Did you ever know any rebuttal show was ever
16 made to rebut what was said in Bashir.
17 A. No.
18 Q. Did you ever hear anything about that.
19 A. Oh, yes. Um, I remember something happened
20 where -- Michael had me sign some papers or
21 something like that. I think something came on.
22 Q. And at some point you learned there was a
23 Maury Povich show that was done as a rebuttal to the
24 Bashir documentary, correct.
25 A. Yes. I remember them coming and filming,
26 but --
27 Q. And you learned at some point that none of
28 this footage in which you and your family are 1996

interviewed ever appeared on that Maury Povich television show, right.
A. I didn't watch it.
Q. As you sit here today, do you know whether or not any of this footage was ever used in the Maury Povich rebuttal show.
A. No, I don't know.
Q. You've never discussed that with anybody.
A. No.
Q. Okay. At this particular point in time, you thought Michael Jackson was going to give your family a home in the Hollywood Hills, correct.
A. No.
Q. Ever hear anybody discuss that.
A. No.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
Q. BY MR. MESEREAU: While your mother was dating Jay Jackson, you considered Michael Jackson a father figure, right.
A. Yes. Well, if -- she was dating her -- him right now, so in this time period I did see Michael as a father figure.
Q. Approximately when did you first meet Jay Jackson.
A. I don't know. I don't remember the first time. But -- I mean, I didn't get close to him 1997

1 until I came back from Neverland.
2 Q. It was many months before this, correct.
3 A. Yes, I believe so.
4 Q. In fact, after this rebuttal was filmed, you
5 went to Jay Jackson's apartment for the interview
6 with the three social workers, right.
7 A. Yes.
8 Q. Were you living at his apartment at that
9 point.
10 A. Yes.
11 Q. How long had you been living at Jay
12 Jackson's apartment at that point.
13 A. A few months. But he was just my mom's
14 boyfriend. He wasn't my stepfather yet.
15 Q. Okay.
16 A. He was just a guy. He was not my stepfather
17 yet.
18 Q. So you had lived at Jay Jackson's apartment
19 for a couple of months before this rebuttal video
20 was filmed, right.
21 A. I believe so, yes.
22 Q. But during those months you considered
23 Michael Jackson to be your father figure, right.
24 A. No, in those months I had no father figure.
25 That's why when I came to Neverland and Michael was
26 like this, I considered Michael as my father figure.
27 MR. MESEREAU: Let's keep going.
28 (Whereupon, a portion of a DVD, People's 1998

1 Exhibit 340, Disk 2, was played for the Court and
2 jury.)
3 Q. BY MR. MESEREAU: Did you discuss with Jay
4 Jackson what your mother was going to say in this
5 video.
6 A. No. I don't even know -- I didn't even know
7 that Jay Jackson even knew about this.
8 Q. Do you recall any discussion at any time
9 with Jay Jackson about you and your family being
10 videotaped.
11 A. No, I do not.
12 Q. You recall going to Jay Jackson's apartment
13 after this was filmed, right.
14 A. Not really.
15 Q. Did you ever discuss with Jay Jackson this
16 videotape after it was filmed.
17 A. No, I don't think I did.
18 Q. Have you ever discussed with Jay Jackson at
19 any time the fact that you made this videotape.
20 A. No, I don't think so.
21 Q. Have you ever heard your mother discuss it
22 with Jay Jackson.
23 A. No.
24 Q. Now, your mother has a curl coming down her
25 face. Do you see that.
26 A. Yes.
27 Q. Did she normally wear her hair that way.
28 A. Yeah, when she had her hair permed, she 1999

always wore it like that.
Q. Always like that.
A. Uh-huh.
Q. Was she ever trying to look like Janet
Jackson.
A. No.
Q. Okay.
(Whereupon, a portion of a DVD, People's
Exhibit 340, Disk 2, was played for the Court and
jury.)
Q. BY MR. MESEREAU: Was what your mother just
said true.
A. He's a nice man. He's -- he's approached
and he's kind of friendly.
Q. Was what your mother just said true.
A. Yes.
Q. Did you believe she was telling the truth
when she talked about Michael Jackson's honesty.
A. The way I felt about it was kind of awkward,
but, I mean, he was pretty honest. But, I mean, the
things that he did was kind of dishonest; you know
what I mean.
Q. Let me ask you what you're talking about.
Did you think when your mother said Michael Jackson
was honest and told the truth, that she was being
truthful.
A. Yes. He's a nice man.
Q. Did you think your mother was being truthful 2000

when she made that statement we just heard.
A. I don't know. You can ask her.
Q. What did you think at the time.
A. I don't remember what I thought at the time.
Q. What do you think now. Do you think she was being honest.
A. As I just said, yes, Michael was a nice man.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
Q. BY MR. MESEREAU: Now, you've told the jury a number of times that Dieter was telling you what to say on this, is that correct.
A. Dieter told us a lot of things to say.
Q. Dieter told you general things to say.
A. Yes. He told us what to say pretty much, yeah.
Q. And I believe when Prosecutor Sneddon was asking you questions, he talked about some type of a sheet of questions. Do you remember that.
A. Uh-huh.
Q. Did somebody show you a sheet with some questions on it before you did this interview.
A. Yes, actually, and kind of waving it in front of the camera right here.
Q. And how many sheets are you talking about.
A. I'm not sure how many sheets it was.
Q. It was just a certain number of questions 2001

1 they told you they were going to ask you, correct.
2 A. Yes. And Dieter went over it with us and
3 told us the answer, what to say.
4 Q. At the time when Dieter went over those
5 questions with you, did you think Michael Jackson
6 had abandoned you as a father figure.
7 A. No. Not then.
8 Q. Okay.
9 (Whereupon, a portion of a DVD, People's
10 Exhibit 340, Disk 2, was played for the Court and
11 jury.)
12 Q. BY MR. MESEREAU: Gavin, you and your mother
13 are living with Major Jay Jackson when she makes
14 this statement about Michael Jackson being a parent,
15 right.
16 A. Yes.
17 Q. Did you think of Michael Jackson as a third
18 parent.
19 A. No. I saw him, as I've said many times
20 today, as a guider, as a father figure. Not my
21 actual father, as I consider Major Jay Jackson
22 today, as he is my stepfather.
23 Q. He has since married your mother, correct.
24 A. Yes.
25 Q. Now, if you know, were -- were Major Jay
26 Jackson and your mother engaged when this video was
27 made.
28 A. I don't know. 2002

Q. Did you expect this video to be on national television at some point when you made it.
A. I didn't even think about it.
Q. Did you ever discuss that with your mom.
A. No.
Q. Okay. Do you remember any discussion involving your mother before this was filmed about whether or not she should sign any documents.
A. No.
Q. Don't recall that at all.
A. Not really, no.
Q. Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
Q. BY MR. MESEREAU: Now, when you used to visit Neverland and Michael Jackson was present, you used to see his children, correct.
A. Yes.
Q. When you flew to Miami and saw Michael Jackson, he was with his children, correct.
A. Yes. I'm sure his children were there.
Q. When you came back from Miami and started visiting Neverland, when Michael Jackson was there, his children were always there, correct.
A. Um, no. Because there was one time that he wasn't at Neverland and he flew somewhere on a commercial plane or something and he came back. 2003

Q. Let me rephrase the question.
When you were at Neverland and Michael was there, you saw his children, true.
A. Yes.
MR. MESEREAU: Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
Q. BY MR. MESEREAU: When your mother made that statement, in your opinion, was she telling the truth.
A. Yes, because sometimes we'd accidentally crash a cart or something, and -- otherwise, probably other people would yell at us or something. And Michael would just say, "It's okay. They can fix it."
Q. Did you ever get in any trouble at Neverland other than crashing carts.
A. Not that I can think of. I think that's the only real bad thing that we did. I mean, accidentally crashing a cart, that's about it.
MR. MESEREAU: Okay.
(Whereupon, a portion of a DVD, People's Exhibit 340, Disk 2, was played for the Court and jury.)
MR. MESEREAU: I believe that's the end, Your Honor.
Q. You remember returning from Miami to 2004

1 Neverland, correct.
2 A. Yes.
3 Q. Do you remember the next day seeing Ed
4 Bradley from 60 Minutes at Neverland.
5 A. No.
6 Q. Do you remember seeing entertainment company
7 executives at Neverland the next day.
8 A. No.
9 Q. Were you there the next day.
10 A. Yes, but I was probably out playing on the
11 rides or something.
12 Q. Do you recall the day that Jesus Salas drove
13 your family away from Neverland.
14 A. Yes.
15 Q. Do you recall your mother getting a full
16 body wax that day in Los Olivos.
17 A. No.
18 Q. Did you know anything about that.
19 A. No.
20 Q. Do you recall your mother telling you she
21 was going to leave Neverland to go to a salon.
22 A. No.
23 Q. Did you ever discuss that with your mother.
24 A. No.
25 Q. Do you know someone named Brett Ratner.
26 A. Yes.
27 Q. How do you know him.
28 A. He was Chris Tucker's director for the movie 2005

1 Rush Hour.
2 Q. Do you recall asking Mr. Ratner if he would
3 arrange for you to fly to Florida to meet Michael
4 Jackson.
5 A. No, I don't remember that.
6 Q. You never did that.
7 A. I don't remember ever doing that.
8 Q. Okay. Do you remember Michael Jackson
9 flying to Florida with Brett Ratner.
10 A. No.
11 Q. Never heard about that.
12 A. No.
13 Q. Okay. Do you recall your mother ever
14 signing an agreement regarding distribution of any
15 of this footage on television.
16 A. No.
17 Q. Well, you said something before -- or you
18 began to say something about Michael Jackson asking
19 you to sign an agreement, correct.
20 A. Yes, there's a little document he had me
21 sign so that I can sign for the rebuttal or
22 something. I don't know.
23 Q. Do you remember signing that document.
24 A. Yes.
25 Q. Michael never asked you to sign that, did
26 he.
27 A. Yeah, he did. And he was with Brett Ratner,
28 and Brett Ratner signed as a witness. 2006

Q. Do you recall your mother signing it also.
A. No. I was the only one that signed it.
Q. Do you recall your mother signing any agreement regarding this video.
A. No.
Q. Okay. Do you recall your mother making any trips outside of Neverland into the city to do errands.
A. No.
Q. Do you recall your mother going shopping with Vinnie Amen.
A. No.
MR. SNEDDON: Excuse me, I'm going to object to vagueness as to what period of time we're talking about here.
MR. MESEREAU: Sure.
Q. We're talking about February 21st, which would be the same day you met Attorney William Dickerman and Jamie Masada at The Laugh Factory. Do you remember that.
A. I remember meeting him.
Q. Do you remember your mother going shopping with Vinnie.
A. No.
Q. Do you remember your mother getting her hair done with Vinnie.
A. No.
Q. Do you remember shopping at Robinson's-May. 2007

A. No.
Q. Do you remember shopping -- excuse me.
Do you remember eating at an Outback Steakhouse.
A. No.
Q. Do you remember your mother going to any
salon that day.
A. I think I remember my mom go to a salon and
meet my stepfather.
Q. Do you know when that was, approximately.
A. No.
Q. Do you remember going on a shopping spree
around February 26th with your mother.
A. I don't know. I remember they took us to
Anchor Blue once because we told them that we didn't
have a lot of clothes at Neverland, and they didn't
want us to go to our house.
Q. Do you remember going to Pacific Sunwear.
A. No.
Q. How about Banana Republic.
A. Yes. I bought some boxers, I think.
Q. How about Gap Outlet.
A. No.
Q. How about Levi Outlet.
A. No.
Q. How about Abercrombie & Fitch.
A. No.
Q. Wilson's Luggage, did you ever go there with
your mother. 2008

A. Yeah, they bought us luggage because they were saying they were going to take us to Brazil, and we didn't have luggage.
Q. Now, two days later -- excuse me, one day later, do you recall going shopping to Robinson's-May.
A. No.
Q. Do you recall going shopping to Adidas.
A. No.
Q. How about Old Navy.
A. No.
Q. Anchor Blue.
A. Yes.
Q. Robinson's-May.
A. No.
Q. Okay. Do you remember on February 28th going to Hsong's Barber Shop for a haircut.
A. I got my hair cut there, but I don't know if we went on February 28th.
Q. Do you remember going there with your mother.
A. I remember going there in the past with my mother.
Q. When you were there, did anyone scream for help.
A. I don't know if we went on February 28th to Hsong's Barber Shop.
Q. When you went to Hsong's Barber Shop, did 2009

anyone scream for help, as far as you know.
A. As I said, I don't remember whether we went there during the time that we were down in Los Angeles area.
Q. Do you remember anyone screaming for help at any of the stores that you recall going to during this period of time.
A. No.
Q. Do you remember going to the Brazilian consulate.
A. Yes.
Q. You went in there with your mother, right.
A. Yes, I'm pretty sure.
Q. Do you remember anybody screaming for help in the Brazilian consulate.
A. No.
Q. You were with your entire family, right.
A. Yes.
Q. Okay. Do you remember seeing a movie called Old School around March 1st, 2003.
A. A little bit.
Q. Your mother, your brother, your sister and you went to that movie theater, right.
A. I don't really remember.
Q. You also went to Anchor Blue that day, right.
A. I believe so. I guess.
Q. When you went to see that movie, do you 2010

1 remember anybody screaming for help.
2 A. No.
3 Q. Do you remember eating at Johnny Rocket's
4 Burgers that day.
5 A. Oh, yeah. I remember that place. It was
6 pretty good.
7 Q. And that was after you saw the movie, right.
8 A. I don't know.
9 Q. You went for burgers and ice cream, right.
10 A. Yes.
11 Q. Do you remember anybody screaming for help
12 when you were at Johnny Rocket's.
13 A. No.
14 Q. Okay. Do you know someone named Brad Buxer.
15 A. No.
16 Q. Did you ever meet any of Michael Jackson's
17 movie producers at Neverland.
18 A. No.
19 Q. Do you know someone named Rio.
20 A. I think he was a little kid that was there
21 for a while.
22 Q. When did you first meet Rio.
23 A. I don't remember.
24 Q. But do you remember seeing Rio at Neverland.
25 A. Yeah, he stood there for like a week or --
26 Q. Did you stay in a guesthouse with Rio.
27 A. No.
28 Q. Never did. 2011

A. No. Well, I might have hung out with him for a while. No, I hung out with his sister, you know. And she was telling me about some girls that thought I was cute from the Martin Bashir thing, and then that was it.
Q. This is Rio's sister.
A. Yes.
Q. Was there a television in the guest room at Neverland.
A. There's a television in every guest room.
Q. Did you ever use that television.
A. We were always playing. We never watched T.V.
Q. Was Rio ever in a room with you at the guesthouse.
MR. SNEDDON: Your Honor, I'm going to object to this line of questioning under the 403 ruling the Court made.
THE COURT: Sustained.
Well, just a minute. I will change that ruling. You may ask.
MR. MESEREAU: Thank you, Your Honor.
Q. Was Rio ever in a guest room with you when you were watching T.V. at Neverland.
A. Um, no. I don't remember really -- I mean, I might have hung out with him in a guest room for a minute, but, I mean, I don't remember watching T.V. with him. 2012

Q. You don't.
A. No.
Q. Are you saying you don't remember or are you saying it just didn't happen.
A. I don't think it happened.
Q. Okay. Do you recall ever telling Rio you wanted to look at adult movies on television at Neverland.
MR. SNEDDON: I'm going to object.
THE COURT: Overruled.
THE WITNESS: No, I don't remember that.
Q. BY MR. MESEREAU: Ever remember stealing alcohol from Michael Jackson's bedroom when Rio was present.
A. No.
Q. Do you recall stealing a $1,000 laminated bill from Michael's room.
A. A thousand dollar bill.
Q. That was laminated.
A. Do they make thousand-dollar bills.
Q. Did you ever steal one.
A. No.
Q. Ever recall masturbating in front of Rio.
A. No.
Q. Now, earlier in your testimony, you said that the only time you'd ever tasted wine was in church. Do you remember that.
A. Yes. 2013

1 Q. Are you telling the jury the only time you
2 tasted wine before you went to Neverland was in a
3 church.
4 A. Yes.
5 Q. Did you ever tell Rio or anyone else at
6 Neverland that you knew what wine tasted like.
7 A. No. I don't remember telling him that.
8 Q. Do you remember calling Chris Tucker and
9 telling him that you wanted to go to Miami to be
10 with Michael Jackson.
11 A. No.
12 Q. That never happened.
13 A. I don't know if it did.
14 Q. You don't know if it did.
15 A. No.
16 Q. Did your mother ever ask you to call Chris
17 Tucker so that your family could go to Miami to be
18 with Michael Jackson.
19 A. No.
20 Q. Has your mother ever coached you on what to
21 say in this case.
22 A. No.
23 Q. Has your mother coached you on what to say
24 in your legal disputes with your father.
25 A. No.
26 Q. Has your mother ever coached you on what to
27 say in the J.C. Penney case.
28 A. No. 2014

Q. Has your mother asked you to write out what
you were going to say before you went to court.
A. No.
Q. Have you ever done that.
A. Done --
Q. Written out what you plan to say before you
went to court.
A. No.
THE COURT: Is this a good place to stop.
MR. MESEREAU: Okay.
THE COURT: All right. We'll recess until
tomorrow morning at 8:30. Remember the admonitions.
See you then.
(The proceedings adjourned at 2:30 p.m.)
--o0o--

2015

REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify: That the foregoing pages 1867 through 2015 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on March 14, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California,
March 14, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
OFFICIAL COURT REPORTER 2016